

PRIVACY POLICY

This Privacy Policy (“Privacy Policy”) explains how information is collected and used by Behavidence, Inc. (“Behavidence” or “we”, “us”, “our”).

This Privacy Policy applies to the Behavidence App (the “App”). By accepting this Privacy Policy, you give us informed consent to collect and process your personal data, and use it as explained in this Privacy Policy.

We are committed to protecting and respecting data privacy. Please read this Privacy Policy carefully.

KEY POINTS OF THE PRIVACY POLICY

The following key points are for your reading convenience and does not substitute the full Privacy Policy below.

- You may use the App either as an anonymous user or a registered user. If you choose to register, you can do so by email or by using your Facebook or Google account. Upon registration you will be asked to provide your gender, year of birth and existing diagnosis of mental health conditions.
- We will also collect your Apps usage data and other general device usage data.
- We will store and process the data we collect about you only for the purposes of providing you with our services, training our models and developing our App (using aggregated and de-identified information), conducting our research (if you agreed to participate) or allowing others to conduct their research that you agreed to participate in. We will not process the data for other purposes not mentioned in this Privacy Policy without obtaining your prior consent. Please note that the information we store is de-identified and we cannot trace it back to you, even if you register to the App.
- Your information may be handled by our service providers for the purpose of maintaining the App. In addition, we will share your information with the researcher conducting the research, if you participate in an external research. We may also share your information with other third-parties, in the event of a merger or acquisition, or if we are required to do so by law or for other legal reasons.
- We may transfer your personal information for processing at locations outside your jurisdiction. In such case, we will abide by data transfer rules applicable to these situations.
- If you chose to participate in our research, you may withdraw your participation at any time by contacting us.
- As our user, you have certain rights regarding your information, such as the right to access, rectify or delete it. You can exercise them via our privacy center at behavidence.accountablehq.com.
- We may change this Privacy Policy from time to time, and will inform you of such changes. Your continued use of the App after being notified of the changes, indicates your consent to the new policy.

PERSONAL DATA PROCESSED

We collect and process your personal information when you register to the App

You may choose to register to the App. You may register by providing your email address and a password, or by using your Facebook or Google account. If you choose to register using your Facebook or Google account, we will only receive your email address.

In addition, upon registration you will be asked to provide your gender, year of birth and existing diagnosis of a mental health condition.

You will also be asked to choose whether you want to participate in the research we conduct to train our models and enhance our database, but participation in our research is not be a condition to using the App.

We refer to all this information as **“Initial Profile Information”**.

Please note that once you register to the App, our system assigns a unique ID to your account, and your email address or name is detached from any other information we collect about you.

Registration is not mandatory. You may choose to use our App as an anonymous user. In that case, you will not be required to provide the above information. However, please note that if you delete the App from your phone and reinstall it, we will not be able to recover the information we previously collected and processed about you.

We collect and process usage data about other applications on your device, as well as general device usage data, as long as the App is active

Once you have registered, and for as long as the App is active, we collect usage data about other application you have, as well as general device usage data. We collect this information from your device’s applications’ usage and activity logs, system clock, accelerometer, gyroscope and light sensor. We refer to this as **“Usage Data”**.

To clarify, we do not collect information about your geolocation or your activity within any other application on your device. We only collect information regarding the times you opened or closed them.

You do not have a legal obligation to provide us with your Initial Profile Information or your Usage Data. However, we are not be able to assess your Mental Health Similarity Score (**“MHSS”**) if you choose to not share this information with us.

We also collect analytics information about your use of the App

When you use the App, we record and collect certain information about your interaction with the App, including time and date of access, language used, buttons and links clicked, and actions taken while using the App. We refer to this data as **“App Analytics Information”**.

DATA CONTROLLER

Behavidence is the data controller of the information described in this Privacy Policy

Behavidence is the data controller of the information described in this Privacy Policy. We determine the purposes and means of processing that data as part of our App.

Behavidence’s contact information

Our contact information is:
Behavidence, Inc.

99 Wall Street #4004
New York, NY 10005

Email: health@behavidence.com

HOW WE PROCESS PERSONAL DATA

To assess your MHSS

We process your personal information in order to assess your MHSS and track any changes in it over time. We will apply our pre-trained models to your Initial Profile Information and your Usage Data, to determine whether your digital behavior is similar to this of people with depression, anxiety or ADHD/ADD.

To conduct our research, enhance our database and train our behavioral models

If you consent to join our research, we will process your information to conduct our research, enhance our database and train the models that encode behavioral profiles relevant for the mental health conditions that our App detects and tracks.

To allow others to conduct research using our App

If you entered a research code in the App, we will process your personal information and assess your MHSS in order to allow the person who leads the research to conduct their research.

To maintain the App

We process the App Analytics Information to provide, maintain and improve your user experience when using our App. We also will use the Analytics Information for quality assurance and for development and enhancement of the App.

We will use the App Analytics Information to prevent fraud, resolve disputes, troubleshoot problems, assist with any investigations, enforce our terms of use for the App and take other actions otherwise permitted by law.

WHO PROCESSES YOUR DATA

We will not share your information with third parties, except in the events listed below or when you provide us your explicit and informed consent.

We will process information with our service providers helping us to operate the App

We will store your Initial Profile Information, Data Usage and MHSS with the assistance of our service providers. Your personal information will be stored under your unique user ID.

In addition, we will process your App Analytics Information with the assistance of our service providers who assist us with the internal operations of the App. These companies are authorized to use your statistical information, which does not contain any identifying details about you, only as

necessary to provide these services to us and not for their own promotional purposes.

If you participate in an external research, we will share information with the researcher conducting the research

If you entered a research code in the App, we will share your personal information and your MHSS with the researcher conducting the research.

We will share information with competent authorities, if you abuse your right to use the App, or violate any applicable law

If you have abused your rights to use the App, or violated any applicable law, we will share information with competent authorities and with third parties (such as legal counsels and advisors), for the purpose of handling of the violation or breach.

We will share your information if we are legally required

We will share your information if we are required to do so by a judicial, governmental or regulatory authority.

We will share your Information with third-parties in any event of change in our structure

If the operation of our business is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition), we will share information only as required to enable the structural change in the operation of the business.

SECURITY

We implement measures to secure your information

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure personal information, it is not guaranteed, and you cannot expect that the App will be immune from information security risks.

INTERNATIONAL DATA TRANSFERS

We will internationally transfer information in accordance with applicable data protection laws

If we transfer your personal data for processing at locations outside your jurisdiction, we will abide by data transfer rules applicable to these situations.

WITHDRAWAL OF PARTICIPATION IN OUR RESEARCH

If you choose to participate in our research, you may withdraw your participation at any time

If you chose to participate in a research may withdraw your participation at any time by contacting us at health@behavidence.com. If you ask to withdraw your participation, we will delete all your personal information relating to the research.

INFORMATION FOR THOSE RESIDING IN THE EUROPEAN ECONOMIC AREA

Legal basis under EU/EEA law for processing your personal data.

The legal basis under EU/EEA law for processing your Initial Profile Information and Usage Data for the purpose of assessing your MHSS, is the necessity of processing for the performance of the contract between you and us, under which we provide the service of assessing your MHSS.

The legal basis under EU/EEA law for processing your Initial Profile Information and Usage Data for the purpose of conducting our research and training our models, is your consent to participate in our research.

The legal basis under EU/EEA law for processing App Analytics Information is our legitimate interest in maintaining, developing and enhancing the App.

The legal basis under EU/EEA law for processing your App Analytics Information and Contact Information for the purpose of handling instances of abusive use of the App is our legitimate interests in defending and enforcing against violations and breaches that are harmful to our business.

The legal basis under EU/EEA law for processing your information with authorities or where we are legally required to share it, is our legitimate interests in complying with mandatory legal requirements imposed on us.

The legal basis under EU/EEA law for processing your information in the event of a change in our corporate structure is our legitimate interests in our business continuity.

You have a right to submit a complaint to the relevant supervisory data protection authority.

Subject to applicable law, you have the right to lodge a complaint with your local data protection authority. If you are in the EU, then according to Article 77 of the GDPR, you can lodge a complaint to the supervisory authority, in particular in the Member State of your residence, place of work or place of alleged infringement of the GDPR. For a list of supervisory authorities in the EU, click [here](#).

YOUR RIGHTS

You have rights to access, update or delete information, obtain a copy of your information, and object or restrict certain data processing activities.

As our user, you have the following rights:

Right to Access your personal data that we process and receive a copy of.

Right to Rectify inaccurate your personal data we have collected and to have incomplete personal data completed.

Right to Data Portability, that is, to receive the personal data that you provided to us, in a structured, commonly used and machine-readable format. You have the right to transmit this data to another service provider. Where technically feasible, you have the right that your personal data be transmitted directly from us to the service provider you designate.

Right to Object, based on your particular situation, to using your personal data on the basis of our legitimate interest. However, we may override the objection if we demonstrate compelling legitimate grounds, or for the establishment,

exercise of defense of legal claims. You may also object at any time to the use of your personal data for direct marketing purposes.

Right to Restrict the processing your personal data (except for storing it) if you contest the accuracy of your personal data, for a period enabling us to verify its accuracy; if you believe that the processing is unlawful and you oppose the erasure of the personal data and request instead to restrict its use; if we no longer need the personal data for the purposes outlined in this Privacy Policy, but you require them to establish, exercise or defense relating to legal claims, or if you object to processing, pending the verification whether our legitimate grounds for processing override yours.

Right to be Forgotten. Under certain circumstances, such as when you object to us processing your data and we have no compelling legitimate grounds to override your objection, you have the right to ask us to erase your personal data. However, we may still process your personal data if it is necessary to comply with a legal obligation we are subject to or for the establishment, exercise or defense of legal claims.

If you wish to exercise any of your rights, please contact us via our privacy center at: <http://www.behavidence.accountablehq.com> .

We reserve the right to ask for reasonable evidence to verify your identity before we provide you with information. Where we are not able to provide you the information that you have asked for, we will explain the reason for this.

CHANGES TO THIS PRIVACY NOTICE

If we change this Privacy Policy, we will make efforts to proactively notify you of such changes.

From time to time, we may change this Privacy Policy. If we do so, we will make efforts to proactively notify you of such changes. In any event, the latest version of the Privacy Policy will always be accessible at the bottom of the App screen. Your continued use of the App after being notified of the changes, indicates your consent to the new policy.

Last Update: September 28, 2021