

Should any discrepancy occur between the English and German version of this document the German version shall prevail. Please find the German version here:

<https://app.alvetherapy.com/documents/privacy-policy-de.pdf>

Privacy Policy

In this privacy policy we inform you about the processing of your personal data when using our services via <http://www.alvetherapy.com> and <https://app.alvetherapy.com>.

1. Entity responsible for data processing and data protection officer

1.1 Contact details of entity responsible for data processing

Entity responsible for the processing of your personal data in accordance with the General Data Protection Regulation (GDPR):

Relearnlabs GmbH

Akazienstraße 3a

10823 Berlin

(hereinafter "Relearnlabs", "we" or "us")

E-Mail: privacy@relearnlabs.com

1.2 Contact details of data protection officer

The contact details of our external data protection officer are as follows:

PPC

Lehrter Str. 23a

10557 Berlin

E-Mail: alve@ppc247.de

2. Using the platform as a patient

Patients can use the platform for video calls without registration. In order to exchange messages, documents and appointment invitations with the therapist outside the therapy session, patients have to register.

2.1 Joining a video call (therapy session) without registration

To enable the patient to participate in the video call, the therapist sends a link to the patient. The therapist may copy this link and send it to the patient directly - without disclosing the patient's personal data to Relearnlabs.

Alternatively, the therapist can use the platform to send a link to the patient via e-mail, so the patient can join the video call. In this case, the therapist must confirm that the patient has given his/her consent to the data processing for this purpose. The therapist can then enter the patient's email address in a form and send it.

Relearnlabs only uses this e-mail address to send the e-mail, it is not being stored.

If the patient has followed the link, he/she must provide the following data in order to participate in the video call:

- First name
- Last name

To establish the video connection, the IP address of the device used is also processed.

2.2 Registration as a patient

In order to be able to use the functions such as sharing documents, sending messages and receiving appointments outside the therapy session, patients must register. The following personal data must be provided for the registration process:

- E-mail address
- Password selected by the patient

After registration, you can voluntarily provide the following data:

- Last name (optional)
- First name (optional)
- Date of birth (optional)
- Telephone number (optional)
- Address data (optional)
- Passport photo (optional)
- Gender (optional)

We use the information on your name, date of birth and gender to enable the therapist to clearly identify you. We use your email address, telephone number and address to be able to communicate with you.

As part of the registration process, we use a double opt-in process to verify that the owner of the email address has registered himself/herself. This means that we send an e-mail with an individual activation link to the e-mail address provided. This link is valid for 24 hours. After that, a new activation link can be requested.

After successful registration, you can log in to your user account using your e-mail address and password.

2.3 Use of activity trackers

We allow patients to import their activity data into ALVE to share with their therapist. Patients can connect activity trackers to ALVE to transfer their activity data. Data can be transferred from cell phones, smartwatches, fitness trackers, and other digital health services such as Apple HealthKit or Google Fit. By connecting their account from another provider to the ALVE platform, patients explicitly authorize us to transfer the activity data from that provider to their ALVE account. The collection of this information is voluntary and not required to use the ALVE platform. The ALVE platform, on the other hand, does not transfer any data to these providers.

Relearnlabs integrates the Thryve Health SDK, which is provided by mHealth Pioneers GmbH, Körtestraße 10, 10967 Berlin, Germany, for this purpose. Relearnlabs entered into a data processing agreement with mHealth Pioneers GmbH. mHealth Pioneers GmbH does not have access to any other data stored within ALVE.

The data is stored as long as it is required for use on the platform. Subsequently, the data will be deleted, unless there are other legal rights or obligations. Continuous use of ALVE is assumed until the end of the contract period.

2.4 Legal basis for the data processing and storage period of the data

The legal basis for the aforementioned data processing for patients is consent pursuant to Article 9 (2) (a) of the GDPR for medical data that you process via our platform (e.g. in the form of uploaded medical reports) and Article 6 (1) (a) of the GDPR for all other personal data.

The connection data of video calls are deleted no later than 90 days after the video call has taken place. In the case of registration, your profile will be deleted as soon as you request it. You can request this by sending an e-mail to info@relearnlabs.com.

Data category	Purpose	Storage period
Account data - E-mail address - Password	Verification of the registration (Double Opt-In)	Duration of the contractual relationship
Personal master data - Participation in video call without registration: - First name - Last name	Verification of the patient towards the practitioner	Up to max. 90 days after the video call (therapy session)
Personal master data: - First name (optional) - Last name (optional) - Date of birth (optional) - Address data (optional) - Phone number (optional)	Correct allocation of an appointment for the practitioner, mandatory documentation by practitioners	Duration of the contractual relationship
Insurance data: - Health insurance (optional) - Health insurance number (optional)	Settlement of the appointment with health insurance company for practitioners	Duration of the contractual relationship
Therapy session dates (including time and duration of video calls)	Mandatory documentation by practitioners	Up to max. 90 days after the video call (therapy session)
IP addresses	Set-up of the video call; For registered patients in addition: To protect the account against brute-force attacks through a captcha solution.	Up to max. 90 days after the video call (therapy session)
Activity data transferred by the patient	Transmission of the activity data to the therapist	Duration of the contractual relationship

Registered patients can share content with their therapist via ALVE. This content is end-to-end encrypted and is only visible to the patient and the therapist and accordingly can only be downloaded and saved by both.

3. Registration as therapist/clinic

In order to use our platform as a therapist, therapists must register. We ask for the following personal data of the therapist:

- Last name
- First name
- Date of birth
- Phone number (optional)
- E-mail address
- Gender
- Address data (home address)
- Where applicable: Address data (of the practice location, the clinic) (optional)
- Profession
- Upload of documents proofing admission as a therapist in speech therapy, physiotherapy, occupational therapy, neuropsychology or other (scan of certificate of approval in the relevant field)
- Upload of other relevant certificates or documents (proof of change of name, e.g.) (optional)
- Payment information

After verification of the documents, the therapist will either receive access to the platform or will be contacted by phone or email to request further data needed to activate the account. All data requested are needed for registration or for identification, contacting, billing.

The legal basis for the processing of these data is Article 6 (1) (b) of the GDPR. Without this data, the use of our service is not possible. We delete this data as soon as the purpose has been fulfilled (e.g. in the case of documents for proof of qualification, as soon as the

qualification has been checked; in the case of other personal data, when the therapist initiates the deletion of his/her account) and no legal retention periods prevent this. The therapist may request the deletion of his/her data after termination of the contractual relationship via email to info@relearnlabs.com.

3.1 Purpose and storage duration of data processing of therapist data

Data category	Purpose	Storage period
Account data - Email address - Password	Verification of registration (Double Opt-In)	Duration of the contractual relationship
Personal master data: - First name - Last name - Date of birth - Gender - Place of residence - Office address (optional) - Phone number (optional)	Provision of our services	Duration of the contractual relationship
Proof of qualification: - Job title - Proof of qualification in occupational field	Control of the authorization to use our services	Job title: Duration of the contractual relationship Document: Until qualification has been checked by Relearnlabs
Therapy session dates (including time and duration of video calls)	Mandatory documentation by practitioners	Up to max. 90 days after the video call (therapy session)
IP address	Set-up of the video call; In addition, to protect the account from brute force attacks by means of a captcha solution.	Up to max. 90 days after the video call (therapy session)
Payment details	Processing payments to provide our services	Up to 10 years after the appointment

We also use the therapist's e-mail address to send him/her surveys on various areas related to the platform at irregular intervals. The receipt of these e-mails can be expressly objected by following the link provided in the respective e-mail. Therapists can share content with their patients via the platform. This content is end-to-end encrypted and is only visible to the therapist and the patient and can therefore only be downloaded and saved by them.

4. Communication on and via the platform

Communication between therapist and patient is authenticated and encrypted via ALVE using our servers, which are located exclusively in Germany. The video chat is based on a peer-to-peer connection between the end devices of the conversation partners, to which we have no technical access.

For the establishment of the Peer-2-Peer connection, we use the video service provider Apizee (Apizee SAS, Espace Corinne Erhel Bâtiment W9, 4 Rue Louis de Broglie, 22300 Lannion, France). For this purpose Apizee gets access to the respective IP addresses of the users, but at no time has the possibility to attend or record the video therapy session.

Relearnlabs is also technically not able to view or listen to the communication of a video therapy session between therapist and patient. The planning and execution of the video therapy session is the sole responsibility of the therapist. Relearnlabs only provides the technical platform for this purpose.

4.1 Notifications form the platform

We use emails to notify you of new messages, scheduled appointments, documents shared with you and missed video calls. The content of the documents and messages is not included in these emails.

To send these emails, we use the service provider Sendinblue as a processor (Sendinblue GmbH, Köpenicker Straße 126, 10179 Berlin).

4.2 Booking of appointments

The therapist books appointments with patients by using the calendar function. If the appointment is made through the ALVE messaging function and the patient is not online at the time of sending, the patient will be informed via e-mail that a message has been sent to his/her mailbox on the ALVE platform. The patient can reply to the therapist using the message function of the platform when he logs in to the platform. The patient receives an e-mail reminder before the appointment. This follows the pattern as described in 4.1.

5. Billing of the platform usage for therapists

Therapists pay a fee for using the platform. The payment processing itself is done via the payment provider Stripe (Stripe Payments Europe Ltd., C/O A & L Goodbody, Ifsc, North Wall Quay Dublin D01 H104, Ireland). Alternatively, therapists can also pay via invoice directly into the Relearnlabs account without using Stripe. Through Stripe, therapists can use SEPA direct debit or credit card as a payment option. For this purpose, Stripe receives transaction data (name of the cardholder, email address, card information, expiry date, CVC code, date, time and amount of the transaction).

6. Server Hosting

As the data protection of your health data is particularly important to us, we store and process the data exclusively in Germany on servers of SysEleven (SysEleven GmbH, Boxhagener Straße 80, 10245 Berlin, Germany).

7. Captcha Solution

We use Friendly Captcha (Friendly Captcha GmbH, Am Anger 3-5, 82237 Woerthsee, Germany) on the basis of our legitimate interest pursuant to Article 6 (1) (f) of the GDPR to prevent misuse of our systems. When solving the captcha, your IP address is forwarded to the captcha service provider, which uses one-way hashing to remove the personal reference. As a result, it does not store any of your personal data.

8. Cookies

Like many other websites we use so-called "cookies". Behind this standard technology are small text files that are stored on the device you are using and which, among other things, make it possible to make visiting a website more convenient or safer. Cookies can also be used to better tailor the offerings on a website to the interests of the visitors or to improve them in general on the basis of statistical evaluations.

The processing of technically necessary cookies takes place within the framework of our legitimate interest in the smooth provision of our service in accordance with Article 6 (1) (f) of the GDPR. For all other cookies, processing is based on your consent (Article 6 (1) (a) of the GDPR).

You can set your browser to inform you about the placement of cookies. This makes the use of cookies transparent for you. You can also delete cookies at any time via the corresponding browser setting and prevent the setting of new cookies. Please note that our websites may then not be displayed and some functions may no longer be technically available.

8.1 Technically necessary cookies

The cookies described below are essential to provide you with our website and platform.

Used cookies:

Name of cookie	Lifetime	Purpose
cookie-accept	12 months	Contains your chosen cookie banner settings.
necessary-cookie	12 months	Contains your chosen cookie banner settings concerning technically necessary cookies.
statistics-cookie	12 months	Contains your chosen cookie banner settings concerning statistics cookies.
marketing-cookie	12 months	Contains your chosen cookie banner settings concerning marketing cookies.

_stripe_mid	12 months	Fraud prevention and detection. Further information: https://stripe.com/cookies-policy/legal
_stripe_sid	30 minutes	Fraud prevention and detection. Further information: https://stripe.com/cookies-policy/legal

9. Contact / customer support

When contacting us (e.g. via customer support chat, telephone or e-mail), the user's details (such as e-mail address, name, telephone number, content of the enquiry) are processed for the purpose of handling the contact enquiry on the basis of our legitimate interest in providing customer service in accordance with Article 6 (1) (f) of the GDPR.

We usually delete your enquiries after one year, unless longer storage is required due to special circumstances (e.g. criminal investigations). In such cases, we delete the data as soon as the purposes of the special circumstances have been fulfilled, provided that there are no legal retention periods to the contrary.

10. Your rights

In the following, we explain the rights which you can exercise against us. You can exercise your rights by contacting us (info@relearnlabs.com) or our data protection officer.

10.1 Information, Article 15 GDPR

You have the right to request confirmation from us as to whether we are processing personal data relating to you. If this is the case, you have the right to obtain information about this data, including a copy of the data, in accordance with Article 15 of the GDPR.

10.2 Correction, Art. 16 GDPR

In accordance with Article 16 of the GDPR, you may request the rectification of inaccurate personal data concerning you and the completion of incomplete personal data.

10.3 Deletion ("Right to be forgotten"), Art. 17 GDPR

You may request the deletion of your personal data if one of the reasons listed in detail in Article 17 of the GDPR applies, e.g. if the data is no longer required for the purposes pursued. This right may be limited if Relearnlabs is nevertheless unable to delete the data due to statutory retention periods. In this case, we will block the personal data and inform the user of this.

10.4 Restriction of processing, Art. 18 GDPR

You have the right to demand that we restrict processing if one of the conditions listed in Article 18 DSGVO applies, e.g. if you have objected to the processing, for the duration of the review by us.

10.5 Data transferability, Art. 20 GDPR

You have the right, under the conditions of Article 20 GDPR, to receive data that you have provided to us in a structured, common and machine-readable format, to transmit it and - if technically feasible - to have it transmitted. This right is only available to the user if we process personal data on the basis of the user's consent pursuant to Article 6 (1) (a) of the GDPR or if we use an automated process for the processing of personal data.

10.6 Complaint, Art. 77 GDPR

You have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data by us violates the GDPR. You can exercise this right with a supervisory authority in the Member State of your place of residence, place of work or the place of the suspected alleged infringement. The contact details of the supervisory authorities in Germany can be found under

https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html

Address and contact details of the regulatory authority responsible for Relearnlabs:

Berlin Commissioner for Data Protection and Freedom of Information

Volker Brozio

Friedrichstr. 219

10969 Berlin

Phone: +49 (0)30 13889-0

Fax: +49 (0)30 2155050

E-mail: mailbox@datenschutz-berlin.de

10.7 Revocation (of consents), Art. 7 (3) GDPR

You can revoke your consent at any time with effect for the future. Data processing up to the time of revocation remains lawful.

10.8 Objection, Art. 21 GDPR

You also have the right to object to the processing of your personal data at any time on grounds relating to your particular situation, provided that we base the processing on Article 6 (1) (e) or (f) of the GDPR. We will then no longer process this data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing serves the assertion, exercise or defence of legal claims (Art. 21 of the GDPR). If personal data is used by us for direct marketing (e.g. by means of e-mail), the data subject has the right to object to the use of his/her data for these purposes at any time.

June 2022.