

## **Privacy Policy**

Your privacy is important to us. It is Emory Musculoskeletal Institute's policy to respect your privacy and comply with any applicable law and regulation regarding any personal information we may collect about you, including across our mobile application "MSKWay" and other applications or websites we own and/or operate.

This policy is effective as of 9 August 2021 and was last updated on 9 August 2021.

### **Information We Collect**

Information we collect includes both information you knowingly and actively provide us when using or participating in any of our services and promotions, and any information automatically sent by your devices in the course of accessing our products and services.

### **Device Information**

When you use MSKWay on your mobile device, our application may automatically collect and use information from your device where it runs. It may include Location (GPS, etc.) for geofencing and indoor navigation, SMS/email for optional support emails, Photos for optional profile picture uploads, and Bluetooth for building access control and BLE for indoor navigation. MSKWay can only access this information if application users grant permissions to the various services.

Please be aware that while a unique application installation ID is assigned to a mobile device using MSKWay, no physical device can be traced to the application installation ID and no user information is collected to this application installation ID.

### **Personal Information**

We may ask for personal information which may include one or more of the following:

- Email

### **Legitimate Reasons for Processing Your Personal Information**

We only collect and use your personal information when we have a legitimate reason for doing so. In which instance, we only collect personal information that is reasonably necessary to provide our services to you.

### **Collection and Use of Information**

We may collect personal information from you when you do any of the following on our website:

- Enroll as a User of our mobile application or web browser to access our content

We may collect, hold, use, and disclose information for the following purposes, and personal information will not be further processed in a manner that is incompatible with these purposes:

- to enable you to access and use our application and associated applications,

### **Security of Your Personal Information**

When we collect and process personal information, and while we retain this information, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorized access, disclosure, copying, use, or modification.

Although we will do our best to protect the personal information you provide to us, we advise that no method of electronic transmission or storage is 100% secure, and no one can guarantee absolute data security. We will comply with laws applicable to us in respect of any data breach.

You are responsible for selecting any password and its overall security strength, ensuring the security of your own information within the bounds of our services.

### **How Long We Keep Your Personal Information**

We keep your personal information only for as long as we need to. This time period may depend on what we are using your information for, in accordance with this privacy policy. If your personal information is no longer required, we will delete it or make it anonymous by removing all details that identify you. However, if necessary, we may retain your personal information for our compliance with a legal, accounting, or reporting obligation or for archiving purposes in the public interest, scientific, or historical research purposes or statistical purposes.

### **Children's Privacy**

We do not aim any of our products or services directly at children under the age of 13, and we do not knowingly collect personal information about children under 13.

### **International Transfers of Personal Information**

The personal information we collect is stored and/or processed where we or our partners, affiliates, and third-party providers maintain facilities. Please be aware that the locations to which we store, process, or transfer your personal information may not have the same data protection laws as the country in which you initially provided the information. If we transfer your personal

information to third parties in other countries: (i) we will perform those transfers in accordance with the requirements of applicable law; and (ii) we will protect the transferred personal information in accordance with this privacy policy.

### **Your Rights and Controlling Your Personal Information**

You always retain the right to withhold personal information from us, with the understanding that your experience of our website may be affected. We will not discriminate against you for exercising any of your rights over your personal information. If you do provide us with personal information you understand that we will collect, hold, use and disclose it in accordance with this privacy policy. You retain the right to request details of any personal information we hold about you.

If you believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us using the details provided in this privacy policy. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading, or out of date. If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact a regulatory body or data protection authority in relation to your complaint.

### **Limits of Our Policy**

Our mobile application may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices.

### **Changes to This Policy**

At our discretion, we may change our privacy policy to reflect updates to our business processes, current acceptable practices, or legislative or regulatory changes. If we decide to change this privacy policy, we will post the changes here at the same link by which you are accessing this privacy policy.

If required by law, we will get your permission or give you the opportunity to opt in to or opt out of, as applicable, any new uses of your personal information.