

Effective date: 1 September, 2019

PRIVACY POLICY

We are Generation Connect Pte. Ltd. (“GenConnects” or “We”) and we own and operate this mobile application, [GenConnects] (the “Application”).

The GenConnects App (the “Service”) is a useful way that you can help log and understand the effects of dementia while contributing, in an anonymous way, to health research as described below. We maintain high standards for the protection of privacy over the internet, and through use of our Service. We value the importance of protecting your privacy, and your personal information. Personal Information means information about you or information that can be used to identify or contact you, such as your name or your email address.

GenConnects takes your privacy very seriously. We ask that you read this privacy policy (the “Policy”) carefully as it contains important information about what to expect when GenConnects collects personal information about you and how GenConnects will use your personal data.

This Policy is written to compile with the Personal Data Protection Act 2012 (No. 26 of 2012) of Singapore (“PDPA”) and applies to information we collect through this Application.

This Privacy Policy governs and explains our collection, use, disclosure and retention of personal information through the Service, and outlines for you the choices you have relating to your personal information. By downloading and using the Service, you agree to the provisions of this Privacy Policy.

Note that the Service is provided to you for education purposes only, and is not a substitute for assessment, diagnosis, and treatment by qualified healthcare professionals. The content provided through the Service is designed for you to use in conjunction with appropriate professional health care, and is intended to open up dialogue between you, individuals who have dementia, and care providers, and to be a tool for you as you navigate living with dementia and caring for someone with dementia. Your use of the Service does not create or imply any type of patient-physician relationship.

1. COLLECTION AND USE OF PERSONAL INFORMATION

1.1 When you download and sign up for the Service, we collect certain personal information from you, in order to allow you to create an account and to effectively use the Service. In order to create an account, we collect your email address, your age and your gender, and ask you to create a confidential password. Your password is private, and should never be shared with anyone. The account information that you provide to us allows us to customize your interactive use of the Service, to respond to e-mail from you, and to inform you of significant changes to this Privacy Policy.

1.2 When you visit us, we may monitor your use of this Application through the use of cookies and similar tracking devices. For example, we may monitor the number of times you have login to our Application or which features you use. This information helps us to build a better experience for our users.

1.3 We also collect certain personal information relating to the individual whose dementia symptoms are being monitored by you and entered into the Service by you, such as first name, last name, age, gender, diagnosis, medication information, education level, dementia symptoms and living arrangements. The purpose of collecting this information is to allow you to take full advantage of the Service, leading to a better understanding of the symptoms and progression of dementia for the individual you are caring for, over time. This information is also collected by us so that it can be used in a completely anonymous, aggregated form for health research purposes, with the goal of improved services and prognoses for people living with dementia.

1.4 We may collect personal data from you in different ways, which includes your interaction with us electronically or in person, or receiving such data from third parties. If we do receive personal data from third parties, we will protect such data according to this policy.

1.5 Before any information that we have collected is used for research on dementia, it is anonymized, meaning identifying information is removed, so it is impossible to link that information to any specific individual. This anonymized information is then aggregated, and trends in this anonymized, aggregated data are then analyzed. We limit collection of personal information to that which is necessary for providing the Service to you, improving the Service, and facilitating the kind of anonymous research into dementia we've described. All information we collect is provided voluntarily by you.

2. USAGE OF YOUR PERSONAL DATA

2.1 We do not use personal information that you provide for any other purpose except to provide you with an accessible, easily updated means of collecting and storing information. Again, the Service is for education and information purposes only. In addition to using your personal information to provide and maintain our Service, we may also use it as follows:

To notify you about changes to our Service

To allow you to participate in interactive features of our Service when you choose to do so

To provide customer support to you

To gather analysis or valuable information so that we can improve our Service

To monitor the usage of our Service

To detect, prevent and address technical issues

To send you newsletters, contact you about products and services we think may be of interest to you

Other types of information collected:

Information will be captured using your camera to provide profile images in the GenConnects app. The images will not be used for any other purposes.

2.2 Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit). We may collect this kind of information when you access the Service. This Usage Data may include information about your device, the portions of our Service that you use, the time and date of usage, the time spent, and other diagnostic data.

2.3 Third party social media features may be made available to the users of this Application and we cannot guarantee the security of any information that the users made public in such features. We also do not guarantee that parties that are able to access such information made available by the users will respect his or her privacy according to this policy or the PDPA.

2.4 By using this Application, you consent to the use of your personal data as set out in this policy.

3. USE OF OUR COOKIES

3.1 Cookies are text files placed on your electronic device(s) to collect standard Internet log information and visitor behaviour information. The information is used to track visitor use of the Application and to compile statistical reports on Application activity. For further information about cookies visit www.aboutcookies.org or www.allaboutcookies.org. You can set your device settings not to accept cookies and the above websites tell you how to remove cookies from your devices. However, in a few cases some of our Application features may not function if you remove cookies from your device settings.

4. HOW WE PROTECT YOUR INFORMATION

4.1 We are committed to maintaining the security of personal information. We have put in place appropriate security procedures and technical and organisational measures to safeguard your personal information such as limited access, use of passwords.

5. ACCESS TO YOUR INFORMATION AND UPDATING AND CORRECTING YOUR INFORMATION

5.1 Subject to the exceptions referred to in section 21(2) of the PDPA, you have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please send an email to Ms. Cassandra Seah at cassandra@genconnects.org. We may charge a fee for this service.

5.2 We want to ensure that your personal information is accurate and up to date. If any of the information that you have provided to GenConnects changes, for example if you change your email address, name or payment details, or if you wish to cancel your registration, please let us know the correct details by sending an email to Ms. Cassandra Seah at Cassandra@genconnects.org. You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

5.3 Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. GenConnects aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data. If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

6. TERMINATION OF USE OF APPLICATION

6.1 You can choose to discontinue our collection of your personal data by uninstalling the Application. Please follow the standard uninstall processes according to device settings. You can also send an email to Ms. Cassandra Seah at Cassandra@genconnects.org to do so.

7. DISCLOSURE OF PERSONAL INFORMATION

7.1 We do not, under any circumstances, give or sell your personal information to other companies or individuals. We will not disclose the personal information you provide to us to anyone unless you specifically authorize it, it is required by law, or disclosure is necessary to protect the safety of customers, employees or property.

7.2 We may share aggregate data (anonymized personal information) for the purpose of advancing research on dementia, as outlined above. The data that we provide for research purposes will always be presented in an aggregate manner, without any information that could be used to identify individuals or users personally. This means that no one can identify any individual user or personal information within those collective data.

8. DISCLOSURE OF PERSONAL INFORMATION TO MAINTENANCE AND DEVELOPMENT CONTRACTORS, AND FOR ANALYTICS PURPOSES

8.1 These contractors provide us with technology and services related to operation, maintenance and ongoing development of the Service. They will have no access to the personal information you have logged through the Service, nor will they be able to match up your account information with any other personal information about you. We also require that our contractors protect the privacy of your personal information consistent with this Privacy Policy, and do not use or disclose your personal information for any purpose other than providing us with products and services. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

9. RETENTION OF PERSONAL INFORMATION

9.1 We will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

9.2 We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

10. SECURITY SAFEGUARDS

10.1 We have a security procedures processes in place that include technical safeguards and a code of conduct for employees who have access to our users' personal information. Only a limited number of authorized employees have access to the account information you provide. Access by authorized employees is strictly controlled by security protocols. No employee has access to the personal health information you enter to track symptoms. To ensure that our privacy practices are met by employees, they are trained in the importance of privacy in all aspects of their work, and sign appropriate confidentiality pledges.

10.2 We comply with select industry standards for protecting Internet users' privacy. We internally review our compliance with those standards on a periodic basis.

10.3 We use state of the art technology to protect your data from outside parties. To ensure the most effective protection of your personal information, we regularly test and update these technical safeguards.

10.4 The security of your data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

11. TRANSFER OF DATA

11.1 Your information, including Personal Information, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

11.2 Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

11.3 We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Policy and that no transfer will take place to an organization or a country unless there are adequate controls in place including the security of your personal information.

12. SALE OF BUSINESS

12.1 If Genconnect's business is sold or integrated with another business your details may be disclosed to our advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business.

13. SERVICE PROVIDERS

13.1 We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services or to assist us in analyzing how our Service is used.

13.2 These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

14. LINKS TO OTHER SITES

14.1 Our Service may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

14.2 We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

15. CHILDREN

15.1 Our Service does not address anyone under the age of 18 ("Children"), and is meant only for use by individuals over the age of 18.

15.2 We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us. If we become aware that we have collected personal information from children without verification of parental consent, we take steps to remove that information from our servers.

16. CHANGES TO THIS PRIVACY POLICY

16.1 We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page. This privacy policy was last updated on 8th day of August 2019.

16.2 You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

17. CONTACT US

If you have any questions about this Privacy Policy, please contact us:

By email: cassandra@genconnects.org