



# Privacy Policy Coala Life

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This is a translated document of the original Swedish version of "Integritetspolicy Coala Life". In the event of misinterpretations in translation, the Swedish version applies.

## 1. General

This Privacy Policy ("Privacy Policy") describes how Coala-Life AB, org. no. 556659-9626, Riddargatan 18, 114 51 Stockholm, Sweden ("Coala Life", "we", "our" and "us"), treats your personal data. We are the controller and responsible for processing of your personal data.

Coala Life protects your personal privacy and always strives to protect your personal data in the best possible way. It is Coala Life's goal to comply with all applicable laws and data protection rules. This Privacy Policy will help you to understand what kind of information Coala Life collects about you and how it is used.

Occasionally, we may need to update or change the Privacy Policy. If so, we will inform you in an appropriate manner and ask you to take note of the changes made. The latest version of the Privacy Policy is always available on our website, [www.coalalife.com](http://www.coalalife.com).

We hope that this Privacy Policy will answer your questions regarding our processing and the protection of your personal data. If you have any further questions or concerns, please feel free to contact us at the above address or by e-mail us at [info@coalalife.com](mailto:info@coalalife.com), or contact the Data Protection Officer at [dataskyddsbudet@coalalife.com](mailto:dataskyddsbudet@coalalife.com).

## 2. How do we process your personal data?

### 2.1. How we collect your information

We collect your information directly from you when you subscribe, make orders with us, create an account to use our app or Coala Care Portal, use your Coala Heart Monitor or otherwise use our services ("Services"). We can also collect your personal data from your healthcare provider if your healthcare provider is a customer of us and you start using the Services.

### 2.2. Purpose of treatment, legal basis and storage period

Your information will not be used in a manner that is inconsistent with the purposes for which the information was collected. We process your information for the purposes listed below.

#### 2.2.1. Provide you with your user account

In order to provide you with our Services, you need to create a user account. In order to do this, we need your name, personal ID and your address and other contact details as your e-mail address. Furthermore, we use your information to ensure your identity.

The legal basis for personal data processing for this purpose is that it is necessary for us to fulfill our obligations under our agreement with you as a user.



### **2.2.2. Provide our products**

We use your personal data to handle orders that you make from us. We use your information to ensure your identity, manage payments, deliver products to you, handle returns and complaints, and otherwise communicate with you regarding your order. The legal basis for personal data processing for this purpose is that it is necessary for us to fulfill our obligations under our agreement with you.

### **2.2.3. Provide our Services**

We also use your personal data to provide you with our Services. When using the Coala Heart Monitor, we record, digitize and store information such as your heart sound and your ECG. Our application Coala App uses this information to guide you and view and analyze your results as well as store your personal journal. In the Coala App, you can also store information about your health such as length, weight, blood pressure, what medicines are taken regularly, if you smoke or have a pacemaker/implanted device.

The legal basis for personal data processing for this purpose is that it is necessary for us to fulfill our obligations under our agreement with you.

### **2.2.4. Carry out research**

We use your personal data in the form of your heart history, also for research purposes in our database Coala Atlas. It is a global database that enables cross-border research and aims to provide researchers with a better basis for developing drugs, products and methods to win the battle against the world's heart disease. We use your cardiac information only after you specifically consent to this and your information will then be collected to our global database Coala Atlas. You choose whether you want the data to be anonymized and used in the research in unidentified form or if they are identifiable.

The legal basis for personal data processing for this purpose is your consent, which is made by the Coala App.

### **2.2.5. Communicate with you**

We use your personal data to communicate with you regarding our Services, including direct marketing and newsletter subscriptions, and provide you with information about important events with us. Direct marketing refers to all types of outreach marketing measures, such as mail, e-mail and text messages. You are free to oppose the use of your information for such purposes, and any mailing from us for marketing purposes includes the possibility of unsubscribing, i.e.. opt-out. We store your personal data for this purpose as long as you subscribe to our marketing outlets, are or have been an active customer, or until you unsubscribe from such mailings.

The legal basis for personal data processing for this purpose is your consent if you have registered for newsletters on our website. If you are a customer of us, the legal basis for personal data processing for this purpose is that it is necessary to fulfill our and your legitimate interest in being able to market our products and services to you under our contractual relationship.



#### **2.2.6. Provide support**

We also use your personal data to help you if you contact us in support matters, such as if you have questions about our products or services. We use your personal data to identify you, communicate with you, and investigate any complaints or support matters. We process your personal data to provide support for at least 12 months after you have terminated your agreement with us.

The legal basis for personal data processing for this purpose is that it is necessary to fulfill our and your legitimate interest in providing support.

#### **2.2.7. Improve our Services**

We will process your information to obtain statistics on how you use our Services. This can be done by perform user satisfaction and market research or by analyzing your use of the Services. When we use your information to improve our Services, we use your data in an aggregated form (i.e. studying overall user patterns using unidentified data) to the extent possible. We also use your data to make the Services more user-friendly, such as to troubleshoot, fix bugs, change the interface so that you can easily access the information you are looking for or highlight features in our Services that are commonly used by our users. We process your personal data to improve our Services for 12 months from the collection of the data.

The legal basis for personal data processing for this purpose is that it is necessary to fulfill our legitimate interest in continuously improving the Services.

#### **2.2.8. Prevent abuse**

Your information can also be used to prevent abuse of our services or to prevent or investigate violations of our services. Misuse refers to fraud, junk mail, harassment, attempted illegal login to user accounts and other actions prohibited by our terms or by law.

The legal basis for personal data processing for this purpose is that it is necessary for our legitimate interest in preventing our services from being abused or preventing and investigating violations against us.

#### **2.2.9. Completing legal obligations**

We may also process your information in order to fulfill our legal obligations under laws, judgments or government decisions. The requirements may include requirements for accounting, product liability and money laundering legislation.

The legal basis for personal data processing for this purpose is that it is necessary for us to fulfill our legal obligations.

#### **2.2.10. Storage period**

By registering as a user, we will keep your data as long as you are a registered user of Coala Life and to the extent necessary for a certain period of time thereafter, for example, for the payment and fulfillment of our commitments. You can unsubscribe at any time as a user.

Unless otherwise stated above, we will store your information for at least twelve months after your agreement has been terminated if you have a Coala Basic subscription and for at



least three years if you have a Coala Premium subscription. This is what we do for you to have access to your heart data.

If you do not want your data stored for the specified time period, you can request that your data to be deleted as soon as our relationship has been terminated by emailing us at [info@coalalife.com](mailto:info@coalalife.com).

### **2.3. How we share your tasks**

We will not share your information with any third party except as described below.

- a. **Hjärtupplysningen:** If you subscribe to a Coala Premium subscription, you have the opportunity to receive healthcare counseling integrated with our app via Hjärtupplysningen. To be able to use these services, we need to share your information with Hjärtupplysningen, an external, independent healthcare provider offering healthcare advice based on your Coala results. As a Coala Premium subscriber, you have automatically given Hjärtupplysningen the consent to access your data via safe authentication when you call them.
- b. **Other external healthcare providers:** If you wish, you can also share your data with external healthcare providers by giving them access to your Coala journal via Coala Care Portal. In order for external healthcare providers to be able to share your Coala journal, you need to give your approval in the Coala app.
- c. **Our Suppliers:** We may use third parties to handle one or more aspects of the business, including processing or handling of personal data. We may share personal data with these third parties to provide services on our behalf, such as sending market communications to you, storing our data, and other IT services. When we use suppliers according to this paragraph, we establish personal data assistant agreements and take other appropriate steps to ensure that your personal data is processed in a manner that complies with this Privacy Policy.
- d. **Sale or Transfer:** We may transfer or transmit your personal data to a Buyer or Potential Buyer upon the sale, transfer or other transmit of all or part of our business or assets. Upon such transfer, we will take reasonable steps to ensure that the receiving party processes your information in a manner that complies with this Privacy Policy.
- e. We can also share your personal data to e.g. police, tax authorities or other authorities when we are required to do so by law.

### **3. How we protect your information**

We take appropriate safeguards and enforce security standards to protect your personal data from unauthorized access, unauthorized disclosure and addiction. We always encrypt your personal data and we cannot access your cardiac data such as measurements and results without your consent. We store your personal data on files available only to our employees, our agents and our service providers who need the information for their service. We use technical tools such as firewalls and passwords, and we ensure that our employees are educated in the importance of maintaining security and confidentiality in relation to the personal data we process.

#### **4. Where do we processing your personal data**

We guarantee an adequate level of protection for our Services by processing your personal data within the EU/EES.

Other third-party IT systems, such as website and support tools, guarantee that your personal data is only processed in countries with adequate protection levels according to the European Commission.

#### **5. Your rights**

This section describes the rights you have as registered. You can always make these rights by contacting us at [info@coalalife.com](mailto:info@coalalife.com)

##### **5.1. Right of access**

If you want information about what personal data we processing about you, you can request access to the information. The information will then be provided in the form of a registry extract which specifies the personal data we process, the purposes for which we handle them, where the information has been obtained, the third parties to whom the data has been transferred and how long the data will be stored.

##### **5.2. Right to rectification**

You are entitled to have incorrect information about you rectified without delay. You are also entitled to complete incomplete information.

##### **5.3. Right to erasure**

You may, in certain circumstances, delete your personal data if our personal data are no longer necessary for meeting the purposes for which they were collected or processed if you have objected to the processing of personal data and we do not have a legitimate interest as weighs heavier than your interest, whether your personal data have been processed illegally or if your personal data has to be deleted to comply with a legal obligation. However, in some cases, we are entitled to oppose the deletion of your personal data and we will inform you if applicable.

##### **5.4. Right to restriction of processing**

You are entitled to require restriction of processing of your personal data in some cases if you contest the accuracy of the personal data during the time it takes for us to check if the information is correct, if the processing is illegal and you oppose the deletion of the data and request instead a restriction, if we no longer need personal data but you need them to determine, enforce or defend legal claims or if you have objected to a treatment based on our legitimate interest during the time we check if our interest weighs heavier than your interests.

##### **5.5. Right to object**

You are entitled to object to the processing of your personal data, which is based on our legitimate interest. If so, in order to continue the processing, we must be able to show compelling legitimate reasons that weigh heavier than your interests, rights and freedoms.



**5.6. Right to data portability**

If we process your personal data on the basis of an agreement with you or your consent, you are entitled to obtain the personal data you have provided to us that concerns you in an electronic format that is widely used when technically possible and this can be done by automated route. You may transfer such data to other personal data controller (data portability) where applicable.

**5.7. Right to lodge a complaint**

The Swedish Data Protection Authority is the authority that is responsible for monitoring the application of legislation among companies that process personal data. If you believe that we are processing your personal data incorrectly, you may, in addition to contacting us, file a complaint with the Swedish Data Protection Authority.

**6. Legal notice and credits**

“Made for iPhone” mean that an electronic accessory has been designed to connect specifically to iPhone and has been certified by the developer to meet Apple performance standards. Apple is not responsible for the operation of this device or its compliance with safety and regulatory standards. Please note that the use of this accessory with iPhone may affect wireless performance. iPhone is a trademark of Apple Inc., registered in the U.S. and other countries.

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