

Medical-Surveys.com

PRIVACY POLICY

This Privacy Policy is effective upon electronic acceptance for all new users from 1 March 2019.

This Privacy Policy applies to all our products and services: our website www.medical-surveys.com and the Apps offered by Medical-Surveys (from here onwards abbreviated as 'MS') We refer to those collectively as the "services" in this policy. Throughout the collective services and texts the terms "we", "us", "our", "Medical-Surveys" and "MS" refer to the Medical-Surveys Co.

References to "data" in this Privacy Policy will refer to whatever data is collected using our services or which MS collects to provide registered users with all contracted services.

"Personal Data" refers to any information relating to an identifiable natural person, i.e. where a natural person can be identified, eg. a name, record number, location data, or any data specific to the person like physical, genetic, physiological, mental, cultural, social or economic information.

This Privacy Policy describes how Personal Data which is generated and collected through our services is safely managed.

1. Data Generation and Flow

1.1 Users:

Our services allow for three types of **users** (Members):

1. Survey Owners (and Creators). The Survey Owner holds an account with MedicalSurveys. The Owner can draft surveys, questionnaires as well as upload/manage forms and documentation. After finalising a *survey draft*, the Survey Owner can *activate* it and thus start receiving Respondents' data. The Survey Owner can also via email invitation link other account holders to the survey and assign those specific privileges. The Owner "owns" the full Survey Data set and can close or choose to delete an active survey.
2. Linked Users (Collaborators). A "Linked user" holds an account with MS *and* is linked to an active survey after authorisation by the Survey Owner. A Linked User has a defined set of privileges within the Linked Survey such as adding surveyed procedures, submitting responses and/or viewing procedure/survey statistics.
3. Respondents. They are the target group of a Survey and provide data in response to questionnaires regarding the Surveyed Procedure. Respondents can (but must not) be patients, or their carers, parents, nurses, other medical/non-medical staff etc. *Registered* Respondents hold an account with MS and their responses are logged via

their account ID.

Unregistered Respondents do not hold an account with MS. They submit responses in a Surveyed Procedure by visiting our Website <https://www.medical-surveys.com>. Here, unregistered respondents log onto a specific procedure providing the Unique Procedure Identifier and Password supplied by the Survey Owner. The responses from Unregistered Respondents are logged anonymously into the database and cannot be tracked back to a natural person.

4. A "Procedure" is the target of a survey. It can be a certain treatment provided to a patient or specific parts of it. It can be anything else of interest to the Survey Owner, eg a certain administrative or managerial act, a function of equipment or materials etc. A Procedure is always created within an *active* Survey either by the Survey Owner or an authorised Linked User with privileges to create Procedures. Every Procedure is pseudonymised and encrypted via a Unique Procedure Identifier (UPI) and a Password (PW) generated by MS.

1.2. Collected Information within MS.

The Personal Data which users provide may include:

A/ Contact Information of Account Holders.

Every Account Holder will provide a

- *UserName*,
- *secure Password* and
- *valid email address*

in order to create a free account with Medical-Surveys. No further personal information is required or stored. The Account ID is used to organise the account's database and to log/register survey design and responses to procedure questionnaires.

MS services do NOT collect/require/request:

- any further personal information of its Account Holders, like real names, addresses (address books), phones, personal interests or preferences etc
- Any educational, professional or institutional background of the Account Holder
- Any personal comments, posts
- any browser and (mobile) device data, like log data, cookies, usage, third party software etc.
- any location information, IP addresses or tracking.
- any referral or other integration information.
- any billing or profile information

To enable in-app purchases, MS will request Account Holders (Survey Owners) to provide details of a valid credit card to their relevant App Store. MS does NOT store any credit card information provided over Our interfaces onto Our servers. All credit card information is stored and processed by the relevant App Store Billing Services. The Credit card information is

invisible to MedicalSurveys and is managed by the App Store Billing Services in full compliance with the PCI DSS (Payment Card Industry Data Security Standard).

MS may use cookies on our website to improve the functionality of the Web-based service. MS may use anonymous logs from entries to the database to improve the functionality of our services.

Medical-Surveys will respond to inquiries and requests from Account Holders by using the provided email address only. MS will never use this information for marketing, advertising or profiling purposes.

Account holders can access their account information and make corrections or updates upon login at any time. The accuracy of such information is solely the responsibility of the user.

B/ Information in Responses to Questionnaires

Account Holders **must not collect or store any direct Personal Information of**

Respondents/Patients (eg. name, date of birth, initials, medical record numbers, email, age, gender, ethnicity, location or similar) in any questionnaire *on Our Platforms and Services*. This type of Personal Information must be kept on an app-external record/registry according to the Privacy Laws of the local state/territory/country/institution.

Account Holders and non-registered Users may provide *indirect* personal information about natural persons by submitting Responses to Survey Questionnaires. This information may refer to personal health, physical and mental, physiological, social, economic and other personal conditions, it may also refer to material, administrative and organisational matters, depending on the type of the particular Survey. All of the Personal Data from Responses is subject to pseudonymisation and encryption. All Procedures enclosed in a Survey are anonymised, pseudonymised, encrypted in transit and at rest and password-protected. The Survey Owner is the only real person who is in possession of the registry to de-anonymise Personal Data collected from Respondents. Survey Owners are solely responsible for preventing Data Breach events by strictly adhering to our Terms and Conditions as well as the Data Protection Laws of their countries of residence and operation. The participants in any Survey will provide explicit informed consent to the Survey Owner for the de-anonymisation of their Personal Data outside of the environment of MS and independent of our services.

1.3 Survey Data Management:

The complete data in transit between all types of users on all service interfaces, and the servers of MS is encrypted using secure TLS cryptographic protocols. The data accumulated within a Survey (questionnaires, forms, responses, links to other users) is secure password protected and encrypted at rest on our global servers.

The database is refreshed in real-time upon input. MS provides basic statistical analyses and viewing tools to the Survey Owner to facilitate access to their data. As such, Medical-Surveys uses this data to deliver the contracted services to the Survey Owner.

Medical-Surveys DOES NOT own the Survey data, neither are we responsible for the data content, validity, quality, authenticity etc. Medical-Surveys cannot provide the Survey Owner with any identification/de-anonymization of real subjects.

MS will only use data from Surveys, Questionnaires or Responses to provide the contracted service of specified data collection to the Survey Owners of the Survey. MS does NOT collect or analyse any information about Surveys or parts of them in our database. MS does not offer to its users any information about deleted surveys, nor details from them, templates or results.

1.4 Shared Personal Data:

The complete Account, Survey, Procedure and Response Data are kept confidential with unrestricted access primarily only by the Survey Owner. In an *active* Survey, on the MS website free access is granted to Respondents with or without account **only** to the Survey Documentation (study design, consent forms, Ethics approval etc) and only after providing the Unique Survey ID (USI). This allows for local *print, view & sign* of consent forms and other legally required documentation.

The Survey Owner can invite other account holders to participate in a particular Survey by sharing the Survey Owner's UserName, contact email and some details from the Survey (Title, Description, Study design forms etc). The Survey Owner can even choose to publish details from a Survey within the MS App (for instance to attract links with other account holders and improve the data flow of the Survey). The public domain in the App is not searchable by conventional search engines like Google.

Data from Responses to active surveys is available for download in .csv file format for further processing in external software. MS does not hold any responsibility for survey data stored outside of our servers.

1.5 Disclosure of Personal Information:

MS may disclose personal information of an account holder, from Surveys and from Respondents in order to comply with a valid subpoena, prosecution and court procedure which is raised against the user/survey by a law enforcement agency or another authorised government institution. Where MS considers necessary and appropriate to protect our rights and properties, detect and manage security threats or fraud, protect the rights and property of our lawful users we may disclose personal information to the relevant authority.

1.6 Ownership, Retention, Erasure/Deletion of Data:

Survey Owners own and are responsible for all data from their Surveys. Survey Owners have the right upon request to be fully informed about the processing of their personal data by our services. Survey Owners can personally erase/delete their own drafted or active surveys at any time thus erasing all data contained in them.

At a deeper level, account holders can close their accounts at any time. This will permanently delete all data associated *only* with their own surveys. Data provided to and owned by a different Survey Owner will NOT be deleted upon closure of an account of a linked user until the corresponding linked survey is deleted from the MS database by its Owner. The Linked User must agree to this mode of data ownership before joining the Survey.

Procedures and their responses within a Survey *cannot* be deleted individually. When a Survey is deleted all included Procedures/Responses/Questionnaires (all survey data) are permanently removed from our database.

In order to avoid bias and cross-contamination of data, Respondents (patients or other target groups) are able to view their personally provided data only *before* their response is submitted to the database. Respondents (like participants in a trial) have the right to know how long their data will be stored or even formally withdraw from a Survey at any time. This right can be executed only by the Survey Owner after direct negotiations with the Respondent and is not a responsibility of Medical-Surveys, as we do not own the data, neither are we able to identify the real persons involved.

MS will never delete data from the account of registered users without their permission unless they breach the Terms and Conditions of use of the MS services. In those circumstances a warning will be issued before the account is closed and data removed from the MS database.

2. Personal Data Security:

Medical-Surveys uses up-to-date technology to safeguard personal data throughout all our services against theft, misuse, unauthorised access or loss. Our website is regularly scanned for vulnerabilities. All Personal Data is securely processed and stored behind very strong password-protected networks on servers with immaculate history of operational safety. Personal Data from Respondents in a Survey is collected anonymously, under a pseudonym, is protected behind a strong password and is accessible solely by the registered Survey Owner (proceduralists) and their linked collaborators who by law abide by the local and global legal research and patient data safety requirements. Our services imply a series of systematic measures to ensure faultless login and data access across surveys and procedures.

3. Cross-Border Data Transfer:

Personal Data (in Responses) may be transferred to other countries for analysis, (eg. in cases of multinational, multicenter trials). The level of pseudonymisation and encryption, security of access and data transfer, and modus operandi of the services is identical in all countries. By using our services all users consent to the transfer of information outside of their country of residence, which may have different Personal Data Protection rules to those in the original country.

4. Changes to Our Privacy Policy

MS will adapt and change this Privacy Policy if the need arises. In cases where our services require a change in the way we manage account or other personal data, we will send an email notification to all account holders.

5. Compliance with GDPR (EU General Data Protection Regulation)

Our data control and processing operations strictly comply with GDPR. Our trusted external service provider is a world leader in data protection and security standards for storage and processing. It is contractually bound to confidentiality. Personal Data can be disclosed only under circumstances outlined in section 1.5 of this Policy.

Contact Information

contact.medicalsurveys@gmail.com