

# CovTracer PRIVACY POLICY

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*Effective 30/03/2020*

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# Terms and Conditions

## 1. General:

We understand the responsibility of protecting any and all information you provide us. We follow a user control policy in terms of explaining information and personal data collection, updating, managing, exporting, and deleting. This means that whenever necessary and as far as possible we seek the user's consent to handling their data and seek their active involvement in governing these.

## 2. Purpose:

Halting the COVID19 epidemic (the outbreak) requires a rapid identification of the contacts with which the infected individuals have had within the previous days and weeks. This, with almost half of the world's population carrying a device capable of GPS tracking, is very much feasible and location trails – time stamped logs of an individual's location – can be created. By checking the user's location trails, one may then identify others who have been in close proximity to the diagnosed carrier and, if the users take appropriate action, reduce the spread of the infectious disease. The first version of the mobile app (the app) targets only those who need to work outside and cannot stay at home. This includes policemen, doctors and nurses, firemen, people working with utilities' companies (electricity, water, internet, etc.). For all who are able to, we strongly advise staying at home to help stop the spreading of the epidemic.

## 3. Brief:

The app was designed to prevent the spread of the outbreak, by allowing the user a more accurate recollection of whereabouts, enhancing the protection of themselves and others. The user alone may choose when to export these data and to whom to supply them to. The app includes a symptom checker.

## 4. Use of the App:

The App creates a digital archive of user's location within a defined period. Privacy is ensured by having the user decide alone which data to extract, when and to whom they will provide it to. There may be of course notable exceptions, within reason, such as court ordered releases of data. The user is free to use the data extracted from their mapping for other reasons but always within a non-commercial and private use adhering to the terms of use and/or service.

The app may be also be used if the user wants to provide an Active Declaration of Movement in conjunction with all and any requirements imposed by national authorities in view of the recent limitation of movement measures taken. A symptom checker is included.

The app will also provide an update on news related to the outbreak.

## 5. Storing of User's Routes Information

Any data regarding the user's routes collected are stored in the user's device alone. Only the user may extract them. The same goes for the symptom checker.

## 6. Contact:

Further Questions, Requests and Clarifications may be addressed [here](#). Alternatively, our email: [info@rise.org.cy](mailto:info@rise.org.cy) may be used

Our Physical Address is:

1. Themistokli Dervi, Nicosia  
Julia House  
Themistokli Dervi Street  
Nicosia 1066 Cyprus
2. Eleftheria Square, Nicosia  
Constantinou Paleologou 1  
Tryfon Building  
Nicosia 1011 Cyprus

## 7. Types of Information that may be provided and use:

User location information in the form of Time-stamped data in five minute intervals is collected. The user may switch on and off the app's logging by selecting the Start/Stop Logging option in the app. location may be determined by: GPS, Device Sensor data, IP address Wi-Fi access points, Bluetooth and cell towers.

The working languages options for the app are Greek and English. Other information includes the full name, address, date of birth and reason(s) of moving per occasion. User name and Password may also be required. A phone number and email address may also be provided. Beyond providing a personal log for the user and a contact and/or verification method, information can be used to assess the user and other's exposure levels to the outbreak and assist the user and relevant authorities in combating the outbreak. The symptom checker collects and stores in the user's device such information as age, gender, postal code, country, previous medical conditions, travels, existing symptoms and close contact with carriers while providing the user with their level of risk based on the answers provided.

## 8. Types of Information to be collected further collected and use:

Information about apps, browsers and devices the user employs in accessing and using the app may be collected to evaluate and improve the services thereof, such as with automatic updates and changes to the terms of use, as well as potentially mapping out the outbreak. This information may include user and third party and other users' interactions.

The methods for collecting such information may include device types, unique identifiers, browser settings, application version number, operating system, network information, crash reports and so on. We also collect information about the interaction of your apps, browsers, and devices with our services, including IP address, crash reports, system activity, and the date, time, and referred URL of your request. The app used Google maps and products. As such the user may refer to those privacy policies. The app has a share function which the user may employ to access communication and/or other apps on their device. As such the user may refer to those apps' privacy policies.

## **9. User Control Approach:**

The User May at any time switch on and off the tracking of the app. This can be done by switching on and off the logging by selecting the Start/Stop Logging option in the app. When so selected the app will no longer trace or begin tracing depending on the choice selected. Any information used for a purpose that isn't covered in this Privacy Policy will be accompanied by a relevant request to do so beforehand. The user maintains the right to withdraw any consent given.

## **10. Tools Used to collect, Process and Store Information:**

The app utilizes a number of technologies such as cookies and local storage to Collect, Process and store Information. Beyond this information may be used by our automated systems that analyze users' reports- should the user choose to share such reports so as to better improve the app and provide more accurate collated data, as well as algorithms to recognize patterns in these. Data that may identify a user are utilized only on accordance with paragraph 12 below.

## **11. Data collection Use:**

The app collects and processes data so as to be able to Provide and Improve Services- as with providing and improving more accurate location logging, develop new services- as with family tracking or close contact tracking, improve the personalized experience- as with more individualized news updates, contact users- as with new app updates available, improve security- as with further enhancing unauthorized use barriers, measure performance- as with statistics on feedback and crash reports send by users and assist and enable user contribution to combating the outbreak as with the user providing authorities with geo-location track records of the users on a consent basis.

## **12. Information Sharing:**

Your Personal information will not be shared with anyone beyond us unless:

1. It is with your consent or
2. The sharing of such information is required and or permitted by law or
3. To trusted collaborators that they do abide by this privacy policy or
4. Address fraud, security, or technical issues or
5. Enforce applicable Terms of Service

Non identifiable information may be shared with others in promoting the purpose of the app. This will be in an aggregated statistical fashion, such as with relevant authorities mapping out outbreak areas.

Should the state of ownership of the app change, as with an acquisition by another party, this Privacy Policy and all amendments thereof, will pass to that acquiring body. Notice will be given beforehand.

### **13. Security:**

The app employs industry standards for protecting against privacy violations. Information gathered helps also to improve this feature. Any notice received of non-secured activity pertaining to the app will be contacted to the user. Responsibility however remains with the user. Beyond this and as part of our effort to prevent any unauthorized access or disclosure of your personal data, we have implemented physical, technical and administrative safeguards. We also update and test our security technology on an ongoing basis and we restrict access to your personal data to those employees who need to know that information to provide our services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

### **14. Rights under this Privacy Policy:**

You have the right to:

- i. Access: this enables you to request access and receive information regarding the personal data we hold about you.
- ii. Request for rectification: this enables you to request to have the data we hold about you to be completed or corrected.
- iii. Request for erasure: this enables you to request the deletion of the personal data we hold about you.
- iv. Restriction of processing: this enables you to make a request, in certain situations, that your personal data are only used for specific purposes.
- v. Object to processing of personal data: this enables you to object to the processing of your personal data
- vi. Data portability: this enables you to request to obtain a copy of the personal data in a structured, commonly used and machine-readable format and/or the transmission of your personal data to another controller.

In order to exercise any of your above rights, please contact us at [info@rise.org.cy](mailto:info@rise.org.cy). We will endeavor to respond to any request as soon as possible and no longer than 30 days from the receipt of the request. In case where we will not be able to respond to your request within the aforementioned time period or in case your request is rejected, we will inform you accordingly explaining the reasons for any delay or for rejecting your request. All rights can be exercised free of charge.

You also have the right to lodge a complaint with the Cyprus Commissioner for Personal Data Protection if at any case you are of the opinion, that our company infringes your privacy. Please find more information at the official website of the Commissioner at [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy).

## **15. Maintenance of Personal Information:**

Personal data is stored on our servers and on the servers of the cloud-based database management services we engage, located within the EU. Information provided to us by you when contacting us with an inquiry, will be retained for 1 year since our last communication with you, unless a longer retention period is required or permitted by law. Personal data submitted will be retained for 1 year unless a request to delete is lodged or the user consents to a longer period.

## **16. Compliance:**

The Policy is regularly reviewed to ensure all legal compliance in The USA and EU. To this end, the policy will be upgraded to incorporate regulatory changes. We will inform you on any policy change.

## **17. Applicability and Amendments:**

This Privacy Policy applies only to the services offered by the app and the developer. The developer's Privacy Policy can be found [here](#). This privacy policy does not apply to any third parties' applications, software and so on and it is up to the user to review these. The developer of the app, Research Centre of for Interactive media, Smart systems and Emerging technologies RISE Ltd (RISE Ltd) reserves the right to modify this Agreement at any time, effective upon the posting of an updated version of it in the app and a notification therein. By using this app, the User consents to this agreement and Continued use of the app after any such amendments shall constitute consent by the user to these amendments.

## **18. Consent to the privacy Policy**

By using this app the user consents to this privacy policy. Continuing to do so following any policy changes means the user has accepted the revised Privacy Policy. See above paragraph for amendments.

## **19. Original Text**

The Original Text was drafted in English. In case of conflict between this and translated versions, the English Text prevails.