

# Ophthalmvision: PRIVACY POLICY

Effective Date: June 2025

## 1. Introduction

Ophthalmvision (“we,” “us,” or “our”) is committed to protecting the privacy and confidentiality of your personal information, including any medical or health-related data you choose to upload, store, or process through our platform (“**Personal Information**”). This Privacy Policy (“**Policy**”) explains how we collect, use, disclose, store, and protect Personal Information when you (“**User**” or “**you**”) access or use our websites, mobile applications, and related services (collectively, the “**Services**”).

If you do not agree with any part of this Policy, you must refrain from using our Services. By accessing or using our Services, you acknowledge that you have read, understood, and agree to be bound by this Policy.

## 2. Scope

1. **Applicability:** This Policy applies to all Personal Information collected through the Services.
2. **Medical Context:** Ophthalmvision may be used to **upload, store, and process medical or health-related information** for various purposes, including communication with healthcare providers, personal health tracking, or other healthcare-related functionalities.
3. **Jurisdictional Compliance:** Depending on your location and the nature of the information, certain regulatory requirements (e.g., **HIPAA** in the United States, **GDPR** in the European Union, or other local laws) may apply. Ophthalmvision strives to comply with relevant data protection regulations; however, the specific obligations may vary based on how you use the Services.

## 3. Information We Collect

We may collect and process the following categories of Personal Information:

1. **Identification Data**
  - a. Name, date of birth, email address, telephone number, mailing address, username, and password.
2. **Medical or Health-Related Data**
  - a. Information about your health condition, medical history, diagnoses, treatments, test results, and other clinically relevant data you choose to upload or transmit through the Services.

- b. Data provided by healthcare professionals or third-party medical devices (e.g., lab results, fundus images) integrated into our platform.
- 3. **Usage Data**
  - a. Information about how you interact with the Services, including device identifiers, IP addresses, browser type, pages visited, and timestamps.
- 4. **Communication Data**
  - a. Content of inquiries, customer support requests, or other communications with us.
- 5. **Payment Data** (if applicable)
  - a. Credit card or other financial account information for subscription or paid features.

**Note:** The exact categories and volume of data we collect depend on your specific usage of our Services.

## 4. How We Use Your Information

Ophthalmivision uses Personal Information for the following purposes:

1. **Provision of Services**
  - a. To register and manage user accounts;
  - b. To facilitate the upload, storage, retrieval, and sharing of medical records and other health-related data;
  - c. To provide features allowing communication between patients, healthcare professionals, or caregivers.
2. **Medical Support and Coordination**
  - a. To enable healthcare providers to access and review your medical data (with your consent or as otherwise permitted by law);
  - b. To support care coordination, monitoring, or other clinical services, if applicable.
3. **Product Improvement and Analytical Purposes**
  - a. To **enhance, refine, and develop** new features or services through advanced data analytics;
  - b. Where legally permissible and with **appropriate consent**, health-related data may be processed in a **secure manner** to improve service functionality, reliability, and efficiency (e.g., aggregated and de-identified data used for algorithmic improvements).
4. **Communication**
  - a. To respond to user inquiries, technical support requests, or comments;
  - b. To send administrative or promotional communications, subject to your marketing preferences or consent where required.
5. **Compliance and Legal Obligations**
  - a. To comply with applicable laws, regulations, or governmental requests;
  - b. To investigate or prevent possible wrongdoing in connection with the Services.
6. **Fraud Detection and Security**

- a. To prevent, detect, and investigate fraudulent or unauthorized activities;
- b. To monitor the technical functioning and security of the Services.

## 5. Legal Bases for Processing (Where Applicable)

In certain jurisdictions (e.g., the European Union), we must have a valid legal basis for processing your Personal Information, which may include:

- **Consent:** When you have given clear and explicit consent to process certain sensitive data (e.g., medical or health-related information).
- **Performance of a Contract:** When processing is necessary to provide the Services (e.g., uploading or sharing medical data).
- **Legal Obligation:** When processing is necessary to comply with applicable laws or regulations.
- **Legitimate Interests:** When processing is necessary for our legitimate interests (e.g., product improvement, data analytics), provided that such interests do not override your fundamental rights and freedoms.

## 6. Disclosure of Your Information

We may share Personal Information with third parties under the following conditions:

1. **Service Providers**
  - a. We engage trusted third-party vendors to perform functions on our behalf (e.g., cloud hosting, data analytics, payment processing). These entities are contractually required to protect your data and only process it according to our instructions.
2. **Healthcare Providers**
  - a. If you use our Services in a clinical context or authorize the sharing of your health data, we may share relevant medical information with your healthcare providers or other authorized medical personnel.
3. **Aggregated and De-Identified Data**
  - a. We may share **aggregated or de-identified data** with research partners, academic institutions, or other third parties to improve the Services, develop new features, or conduct research. This data does not identify you personally.
4. **Business Transfers**
  - a. In the event of a merger, acquisition, asset sale, or other corporate transaction, your Personal Information may be transferred as part of the transaction, subject to confidentiality obligations and appropriate safeguards.
5. **Legal or Regulatory Requirements**
  - a. We may disclose Personal Information if required by law or in response to lawful requests by public authorities (e.g., to comply with a subpoena, court order, or other legal process).
6. **Consent**

- a. We may disclose your Personal Information to a third party when you have expressly provided consent for such disclosure.

## 7. International Data Transfers

Your Personal Information may be processed in countries outside of your jurisdiction, which may have different data protection laws. Where required by local law or regulation (e.g., GDPR), we will implement appropriate safeguards, such as **Standard Contractual Clauses**, to ensure the protection of your data when transferred internationally.

## 8. Data Retention

We retain Personal Information only for as long as necessary to fulfill the purposes outlined in this Policy or to comply with our legal or contractual obligations. Retention durations may vary based on the nature of the medical data, relevant healthcare regulations, and requirements imposed by applicable law.

## 9. Security Measures

Ophthalmvision takes reasonable administrative, technical, and physical measures to safeguard your Personal Information against unauthorized access, disclosure, alteration, or destruction.

These measures include encryption of data (both at rest and in transit), secure data centers, and limited access controls. While we strive to protect your data, no security system is infallible; thus, we cannot guarantee absolute security.

## 10. Children's Privacy

Ophthalmvision does not knowingly collect or solicit Personal Information from individuals under the age of 13 (or the applicable age of majority in your jurisdiction) without verifiable parental or guardian consent. If we become aware that we have collected such information without appropriate authorization, we will promptly delete it. If you believe we have collected data from a minor, please contact us at the address in Section 14.

## 11. Your Rights and Choices

Depending on your jurisdiction, you may have certain rights regarding your Personal Information, such as:

1. **Access:** Request a copy of your Personal Information in our possession.
2. **Rectification:** Correct or update inaccurate or incomplete data.
3. **Erasure:** Request deletion of your Personal Information, subject to legal exemptions.
4. **Restriction of Processing:** Restrict certain types of data processing where you dispute the accuracy or legality of the processing.
5. **Data Portability:** Obtain a copy of your Personal Information in a structured, commonly used format and transfer it to another service or provider where technically feasible.
6. **Objection:** Object to specific processing activities, including direct marketing or data processing based on legitimate interests.
7. **Withdrawal of Consent:** Withdraw previously given consent at any time (e.g., if you agreed to share certain medical data with a healthcare provider).

To exercise any of these rights, please contact us using the details provided in Section 14. We may require verification of your identity before addressing your request.

## 12. Third-Party Websites and Services

Our Services may contain links to third-party websites or services that operate independently of us. We are not responsible for the content, security, or privacy practices employed by these external platforms. We encourage you to review the privacy statements of any external website or service you visit.

## 13. Changes to This Policy

Ophthalmvision reserves the right to modify or update this Policy at any time. We will provide notice of material changes by posting the revised Policy on our website or by other communication methods. Your continued use of the Services following any update indicates your acceptance of the revised Policy. If you do not agree with any modifications, you must discontinue using the Services.

## 14. Contact Information

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us at:

- **Email:**[support.ophthalmvision@gmail.com](mailto:support.ophthalmvision@gmail.com)

We will make reasonable efforts to address your inquiry in a timely manner.