

Privacy Policy End Users

Information on how we process your personal data

1. Introduction

This Privacy Policy (the “**Policy**”) describes how Industry Frontiers AB, reg. no. 559097-1353 (“**Industry Frontiers**”, “**we**”, “**us**” or “**our**”), at the address Neversvägen 31, 224 79 Lund, processes your personal data when you use the Manje platform.

In order to simplify healthcare in Africa by connecting chronic disease patients to specialists for a second opinion and to specialist hospitals for a better treatment. Industry Frontiers have constructed and provides the Manje platform (“**Manje**”). Manje Health is a search and discovery platform for chronic disease treatment in Africa, that enables patients to find all possible care options, compare treatment prices, access diagnostic services and connect with specialist doctors across the continent.

We are responsible for the processing of your personal data as described in the Policy in the capacity of data controller. If you would like to know more about our processing of your personal data, you are welcome to contact us, e.g. via the address above or via our email address: info@industry-frontiers.com

It is important to us that you feel comfortable with how we process your personal data, and we therefore ask you to read through this Policy, which we may update from time to time. If we make changes to the Policy, the new version will apply from the time it is published on our website. At the top of the page, you can see when the Policy was last changed.

2. How we collect your personal data

The personal data we process relating to you is collected from you when you use the Manje platform and possibly through your medical records if they are provided to us.

3. How we process your personal data

3.1 Introduction

We only process your personal data to the extent permitted in accordance with applicable data protection legislation. This means inter alia that we need to have a legal basis for the purposes for our processing your personal data, which in our context generally means one of the following legal bases.

Performance of a contract – the processing is necessary in order for us to provide you with our services or otherwise perform a contract between us.

Consent – the processing is carried out with your prior consent.

Below, we explain more about the categories of personal data we process, for what purposes we process them and what legal bases we rely on when processing your personal data, including for how long we store your personal data.

3.2 To provide Manje

Categories of personal data

The personal data we process consist of your:

- first and last name;
- address;
- telephone number;
- e-mail address;
- geo-position;
- medical records (if such exist and we can access them); and
- health data.

Purposes of the processing

To be able to provide you with the service and to allow you to contact special doctors, book appointment and to allow the healthcare providers that you contact to provide a correct diagnosis.

Legal basis: The processing is necessary to conclude and perform the contract with you as a user of Manje.

Basis for processing of special categories of personal data: We will due to your use of the Manje platform process personal data concerning your health. We process your health data based on your prior consent. If you withdraw your consent, we will no longer process your health data and will therefore no longer be able to provide you with our services.

Storage period: We collect and store the personal data, except your health data and medical records, listed above as long as you are a user of the Manje platform. Should you choose to delete your account we will delete your data as soon as possible unless we are obliged to store it for our compliance with applicable legal obligations.

Your health data and potential medical records will be deleted from our systems within five days after your appointment with the care provider.

3.3 Newsletters and other marketing messages

Purposes of the processing

The personal data we process consists of your:

- email-address; and
- first and last name.

Categories of personal data

To administer and send marketing messages via email for the purposes of providing information about our business, services and current activities.

Legal basis: We only send marketing messages via email to you if you have registered for them and thereby consented to receiving them

Storage period: We process and store your personal data to send marketing messages via email to you as long as you have not opted out from receiving further messages. Such opt-out can be done at any time by using the link for opt-out provided in our messages.

3.4 To fulfil legal obligations or to establish, exercise or defend legal claims

We may process your personal data in order to fulfil our legal obligations according to law or other statutes that we are subject to, or if we are subject to orders or decisions by courts or authorities, which require us to process your personal data.

We may also process your personal data so that you, we ourselves, our any relevant third party can establish, exercise or defend its legal claims, e.g. in connection with an ongoing dispute.

4. How we share your personal data

Access to your personal data is limited to persons who require such access for the purposes described in Section 3 above. Your personal data may therefore be shared with the following categories of third party recipients:

- a) Care providers and contract doctors: We will, in order to be able to provide Manje to you as a user share your personal data with the specialists and specialist hospitals you wish to contact and book an appointment with.
- b) Companies within our group: We may share your personal data with other companies within our group. If we share your personal data with other companies within our group, we will ensure that the personal data continues to be processed in line with this Policy.
- c) Service providers: We use third party service providers to manage parts of our business operations. We may share personal data with such third parties in order for them to supply us with services, e.g. IT services or other administrative functions or provide services as sub-contractors in connection with our own services. When we use such service providers, we enter into data processing agreements and take other suitable measures to ensure that your personal data is processed in line with this Policy.
- d) Our partners: We may from time to time cooperate with external parties in order to improve our services and business. Such parties either process your personal data as data controllers according to their own terms and policies for handling personal data, or as our data processors according to our instructions. In the latter case, we enter into data processing agreements and take other suitable measures to ensure that your personal data is processed in line with this Policy.
- e) Public authorities: We may share your personal data with public authorities when we are required to do so by e.g. applicable law or other legal statutes or orders or decisions by courts or authorities in order to fulfil the legal obligation specified therein.

5. Where we process your personal data

We strive to always process your personal data within the EU or EEA. However, we may transfer your personal data to service providers who, either themselves or by their sub-contractors, are located or have business activities in a country outside the EU or EEA. In such cases, we are responsible for ensuring that the transfer is made in accordance with applicable data protection legislation before it occurs, e.g. by ensuring that the country in which the recipient is located ensures an adequate level of data protection according to the Euro-

pean Commission, or by ensuring appropriate safeguards based on the use of standard contractual clauses that the European Commission has adopted and appropriate supplementary measures in order to ensure a level of protection to your personal data essential equivalent to the European standard and when applicable other appropriate measures to safeguard your rights and freedoms.

You may access a list of the countries that the European Commission has decided provide an adequate level of data protection at http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm.

You may access the European Commission's standard contractual clauses at [Standard Contractual Clauses \(SCC\) | European Commission \(europa.eu\)](#).

6. Your rights

You have rights in relation to us and our processing of your personal data. Below, you will find information about your rights and how you can exercise them.

Please note that your rights apply to the extent that follows from applicable data protection legislation and that there may be exceptions to the rights where applicable. We also ask you to note that we may need more information from you in order to e.g. confirm your identity before proceeding with your request to exercise your rights.

To exercise your rights or request information about them we ask that you contact us, which is most easily done via email: info@industry-frontiers.com

6.1 Right of access

You have the right to obtain a confirmation as to whether or not we process your personal data. If that is the case, you also have the right to receive copies of the personal data concerning you that we process as well as additional information about the processing, such as for what purposes the processing occurs, relevant categories of personal data and the recipients of such personal data.

6.2 Right to rectification

You have the right to, without undue delay, have incorrect personal data about you rectified. You may also have the right to have incomplete personal data completed.

6.3 Right to erasure

You have the right to obtain that we erase your personal data without undue delay in the following circumstances:

- The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- Our processing is based on your consent and you withdraw your consent to the relevant processing;
- You object to processing that we carry out based on a legitimate interest, and your objection overrides our or another party's legitimate interest of the processing;
- The processed personal data is unlawfully processed;

- The processed personal data has to be erased for our compliance with one or more legal obligations.

6.4 Right to restriction

You have the right to request that we restrict the processing of your personal data in the following circumstances:

- You contest the accuracy of the personal data during a period enabling us to verify the accuracy of such data;
- The processing is unlawful and you oppose erasure of the personal data and request restriction instead; and
- The personal data is no longer needed for the purposes of the processing, but is necessary for you for the establishment, exercise or defense of legal claims.

6.5 Right to data portability

If our processing of your personal data is based on the performance of a contract with you or your consent, you have the right to receive the personal data you have provided us relating to you in an electronic format. You also have the right to have the personal data transferred from us directly to another data controller, where technically feasible.

We ask you to observe that this right to so called data portability does not cover personal data which we process manually.

6.6 Right to withdraw consent

If our processing of your personal data is based on your consent, you always have the right to withdraw your consent at any time. A withdrawal of your consent does not affect the lawfulness of the processing that took place based on the consent before your withdrawal.

7. Complaints with the supervisory authority

Industry Frontiers is a Sweden based company. Thus, the Swedish Authority for Privacy Protection (Sw. *Integritetsskyddsmyndigheten*) is the authority responsible for supervising the application of current data protection legislation. If you believe that we process your personal data in a wrongful manner, we encourage you to contact us so that we can review your concerns. However, you may file a complaint with the Swedish Authority for Privacy Protection at any time.
