

# Privacy Notice

## of OsteoCoach

### Introduction

Welcome to the OsteoCoach Privacy Policy.

This Privacy Notice ("Notice") sets out the terms under which we handle your personal data while you use OsteoCoach in accordance with article 13 of the General Data Protection Regulation ("GDPR"). Your privacy is very important to us and the GDPR allows us to protect your personal information.

"Personal data" is any information relating to an identifiable living individual. This encompasses information that directly identifies a person (like their name or address) as well as indirect identifiers (random IDs) that, when combined with other pieces of information, could reasonably be used to pinpoint a specific person.

Personal data collected through OsteoCoach will be processed solely and exclusively for the purposes described in this document and will not be used for any other purpose.

### What is OsteoCoach?

The OsteoCoach mobile app is a software designed to reduce the risk of falls in people aged 65 and over. This software is intended for use in a domestic setting. The software collects information on the fitness status and fall-related fears of users. Based on this information, it creates a personalized, modular training program that aims to improve the users' strength and balance and reduce their fear of falling.

### Who processes your personal data?

Only for the purposes mentioned under section "why do we process your data" the Data Controller is:

Osteoconnect GmbH

Hauptstraße 65, 12159 Berlin

Amtsgericht Charlottenburg HRB 153253 B

Tel: 030 - 57 71 03 600

Email: [kontakt@osteocoach.net](mailto:kontakt@osteocoach.net)

If you have any questions related to how we process your personal data you can contact us at any time by sending an email to: [support@osteocoach.eu](mailto:support@osteocoach.eu)

### Data Protection Officer

To further strengthen your data protection, we've appointed a dedicated Data Protection Officer (DPO), who you can contact if you have any questions about how your personal data is processed, or if you believe your privacy rights may have been infringed.

You can contact our DPO by sending an email to: [osteconnect-dpo@chino.io](mailto:osteconnect-dpo@chino.io)

### What data do we process?

For the provision of the App, we process the following categories of Personal Data, in accordance with DiGAV §4, 2, 1-3 (including "intended use"):

| Categories of personal data            | Special category of data | Examples of data processed |
|----------------------------------------|--------------------------|----------------------------|
| Common data - Physical characteristics | No                       | Gender                     |
|                                        |                          | Year of birth              |

| Categories of personal data                            | Special category of data | Examples of data processed                                           |
|--------------------------------------------------------|--------------------------|----------------------------------------------------------------------|
| Common data - Other Personal                           | No                       | Content of communications (messages to and from the support service) |
| Common data - Usage data                               | No                       | Notification preferences                                             |
|                                                        |                          | Usage logs                                                           |
| Identifiers - Personal Information                     | No                       | Password                                                             |
|                                                        |                          | PIN                                                                  |
|                                                        |                          | Username                                                             |
| Identifiers - Online                                   | No                       | Device ID                                                            |
|                                                        |                          | Device information                                                   |
|                                                        |                          | IP Address                                                           |
| Quasi-Identifiers - Pseudonyms                         | No                       | Activation code                                                      |
| Biometric information (where used to identify someone) | Yes                      | Face scan                                                            |
|                                                        |                          | Fingerprint                                                          |
| Health information                                     | Yes                      | Balance level                                                        |
|                                                        |                          | Chair rising test results                                            |
|                                                        |                          | Exercise questionnaires                                              |
|                                                        |                          | Fall diary entries                                                   |
|                                                        |                          | Fall risk classification                                             |
|                                                        |                          | Fitness level progression                                            |
|                                                        |                          | Health check - FES assessment                                        |
|                                                        |                          | Health check- pre screening fitness status                           |
|                                                        |                          | Injury information                                                   |
|                                                        |                          | Loss of consciousness                                                |
|                                                        |                          | Personalised exercise plan                                           |
|                                                        |                          | Prescription duration                                                |
|                                                        |                          | Stage test results                                                   |
|                                                        |                          | Strength level                                                       |

## Why do we process your data?

We will process your personal data for the following purposes:

| Purpose                                                  | Activities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Legal basis (art. 6 and art. 9)             | Provision of personal data                                                     | Data Categories                                        |
|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------|
| Provision of the service for the intended use of the app | <p>Account Registration and Authentication</p> <p>The controller processes personal data of patients in order to create and manage user accounts and to allow secure access to the application. For this purpose, patients are required to provide their name, email address and a password. To activate their account, patients must also enter an activation code provided in connection with the prescription of the app. To log into the application, users may authenticate using their password or, optionally, through biometric authentication mechanisms available (e.g. fingerprint or facial recognition).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 6(1)(a) Consent<br>9(2)(a) Explicit consent | The provision of the data is necessary in order to access and use the app.     | Common data - Physical characteristics                 |
|                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                             |                                                                                | Identifiers - Personal Information                     |
|                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                             |                                                                                | Quasi-Identifiers - Pseudonyms                         |
|                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                             |                                                                                | Biometric information (where used to identify someone) |
| Providing assistance and support                         | Providing assistance and support                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 6(1)(a) Consent<br>9(2)(a) Explicit consent | Your data will only be processed if you contact us.                            | Common data - Other Personal                           |
|                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                             |                                                                                | Identifiers - Personal Information                     |
| Provision of the core functionalities of the app         | <p>Provision of the core functionalities of the app</p> <p>The controller processes personal data of patients, including data concerning health, in order to provide them with the core functionalities of the application. The app enables users (patients) to input information relating to their fall history, fear of falling, balance and strength levels through questionnaires and functional tests. This information is analysed to assess the user's fall risk and fitness level (strength and balance), and to generate a personalised daily exercise plan aimed at reducing fall risk and supporting osteoporosis prevention. The application further allows users to log completed exercises, record falls in a dedicated fall diary, and answer follow up questionnaires. Based on this information, the app continuously updates the user's fitness level and adapts exercise recommendations accordingly. The app also provides additional exercise modules, such as Tai Chi exercises, as part of the personalised training programme, and educational content to support fall prevention awareness.</p> | 6(1)(a) Consent<br>9(2)(a) Explicit consent | The provision of this data is necessary to use the functionalities of the app. | Common data - Physical characteristics                 |
|                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                             |                                                                                | Identifiers - Personal Information                     |
|                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                             |                                                                                | Identifiers - Online                                   |
|                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                             |                                                                                | Health information                                     |

| Purpose | Activities                                                                                                                                                                                                                                                                | Legal basis (art. 6 and art. 9)             | Provision of personal data                                                                                                                          | Data Categories          |
|---------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
|         | Security Monitoring and Logging<br><br>Processing of technical log data and device information to monitor system security, detect unauthorized access, and ensure the integrity and availability of the application.                                                      | 6(1)(a) Consent<br>9(2)(a) Explicit consent | We collect these data categories automatically when you use our app.                                                                                | Common data - Usage data |
|         |                                                                                                                                                                                                                                                                           |                                             |                                                                                                                                                     | Identifiers - Online     |
|         | Sending push notifications<br><br>Users can activate push notifications to receive general reminders about important events and reminders to complete their exercises. These notifications do not include specific health information or detailed health related content. | 6(1)(a) Consent<br>9(2)(a) Explicit consent | Voluntary. Push notifications are disabled by default and users can choose to enable or disable push notifications at any time in the app settings. | Common data - Usage data |
|         |                                                                                                                                                                                                                                                                           |                                             |                                                                                                                                                     | Identifiers - Online     |

## Do we disclose your data to anyone?

We will not disclose personal data to third parties, unless such disclosure is necessary to carry out certain processing activities. This is the case where we rely on service providers, who act as Data Processors under Article 28 GDPR and who will only process your personal data under appropriate confidentiality and security obligations, in accordance with our instructions and with this Notice.

The service providers we currently engage to process personal data on our behalf, the purposes of the processing, and the categories of data involved, are the following:.

**Open Telekom Cloud (OTC):** We use hosting services provided by Telekom Deutschland GmbH, Landgrabenweg 151, 53227 Bonn, Germany. These services provide the infrastructure, computing capacity, storage and technical maintenance required to operate the app. Our hosting provider processes all data from users of the DiGA app listed under the data categories above. This processing takes place within the EU/EEA. Further information about the service provider can be found at: <https://open-telekom-cloud.com/de/datenschutz/>

**Bunny.net:** We use BunnyWay, informacijske storitve d.o.o. (Ljubljana, Slovenia) to deliver exercise video, image and audio content within the app. In providing this service, online identifiers such as IP address and device/connection data are processed. Our account is configured so that content is delivered exclusively through EU points of presence and stored in EU-based storage, so that this processing takes place within the EU. No health or special-category data is processed by this provider. Further information about the service provider can be found at: <https://bunny.net/privacy/>

**OneSignal:** We use OneSignal, Inc. (San Mateo, California, USA) to deliver push notifications. In providing this service, the following data is processed: name, email address, device identifier and IP address. As the provider is based in the USA, personal data may be transferred there; such transfer takes place on the basis of the EU-US Data Privacy Framework, under which OneSignal is certified (an adequacy decision under Article 45 GDPR). No health or special-category data is processed by this provider.

## Do we transfer your data outside the EU/EEA?

Your personal data will be processed within the European Union and the European Economic Area. Should it be necessary for your personal data to be transferred to third countries outside the EU/EEA, such data transfers will take place only to third countries with an Adequacy Decision in place approved by the European Commission.

## How long do we retain your personal data?

You can use OsteoCoach for the duration of your prescription period (Lizenzdauer), which is 90 days from activation of your access code. We process your personal data on the basis of your consent (Art. 6(1)(a), Art. 9(2)(a) GDPR and § 4(2) DiGA-V) for as long as you use the app, until you withdraw your consent, or until your account is deleted.

At the end of the 90-day prescription period, we remove the connection between your data and your voucher code and delete the pseudonym you provided during onboarding. Where the remaining data can no longer be attributed to you, it is anonymised; any data that remains identifiable is deleted.

If you wish to keep your data — for example because you expect a follow-up prescription — you can consent to extend the storage period by a further 30 days. We will notify you before your data is deleted. You can withdraw this consent at any time; if you do not renew within the extension period, your data is anonymised or deleted as described above.

Where statutory retention obligations apply (e.g. legal, tax or accounting obligations), we retain the relevant data until those periods end. If personal data is no longer necessary and no other legal basis applies, we delete it.

| Purpose                                                  | Data Retention |
|----------------------------------------------------------|----------------|
| Provision of the service for the intended use of the app | 90 days        |

## How do we support you in exercising your rights?

We inform you that you have the right to:

- Ask us whether or not your personal data is being processed, and if so, request access or ask for copies of your personal data. You can also ask us for further information related to this Policy (Right of Access);
- Ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete (Right to rectification);
- Ask us to erase your personal data in certain circumstances (Right to erasure or ‘right to be forgotten’);
- Object, under certain circumstances, to the processing of personal data, for reasons relating to your specific situations (Right to object);
- Not be subjected to automated decision-making, including profiling (Rights related to automated individual decision-making, including profiling);
- Receive personal data in a standardized format in case you wish to transfer them to another data controller (Right to data portability);
- Lodge a complaint at any time with the Data Protection Authority, in case of violation of data protection rights (Right to lodge a complaint with a Supervisory Authority);
- Ask us to restrict the processing of your information in certain circumstances (Right to restrict the processing);
- In the event of rectification, erasure, or restriction of the processing of your personal data, we are committed to notifying such changes to all recipients to whom the data has been disclosed, unless this proves impossible or involves disproportionate effort;
- Withdraw your consent at any moment.

The exercise of rights is not subject to any formal constraints and is free of charge.

You may exercise your rights by contacting us at the following address: [support@osteocoach.eu](mailto:support@osteocoach.eu)

## How to withdraw your consent

When we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time. Withdrawing your consent does not affect the lawfulness of the processing carried out before the consent was withdrawn.

You may revoke your consent by accessing the Consents section in your profile under Settings. Please note that in certain circumstances revoking your consent may require your profile to be deleted.

## How to delete your Account and uninstall the app

You can delete your account and uninstall the app at any time. To do so, you must access your profile and click on “delete account” in the Settings. You should then follow the instructions on your device to uninstall the app. Before deleting the account you may have the option to download all your data. Alternatively, you may contact us to exercise your right to data portability.

## How to contact us

You may exercise your rights by contacting us at: [support@osteocoach.eu](mailto:support@osteocoach.eu). We will get back to you as soon as possible and, in any case, no later than 30 days upon receiving your request. Furthermore, you can always contact our customer support service if you need support when using the app. The service is available in English and German language and all queries will be handled as soon as possible, in any case, within 24 hours upon receiving your request.

## Links to third parties websites

OsteoCoach may contain links to websites operated by third parties. We are not responsible and have no control over how they operate or how they process data. We encourage you to read their privacy notices before using those websites.

## Updates

This Policy may be subject to changes and reviews.

All personal data processed is subject to this Policy effective at the time it was collected.

Any changes to this Policy will be posted on this page and, if necessary, notified to you.

We encourage you to consult our Policy periodically so that you are always informed about how we process your personal data.

This Policy was last updated on 10/07/2026