

# Privacy Policy of yoboo

Yoboo collects some Personal Data from its Users.

## Owner and Data Controller

Intake bv  
Quellinstraat 12/6  
BE-2018 Antwerpen

**Owner contact email:** [contact@yoboo.health](mailto:contact@yoboo.health)

## Types of Data collected

Among the types of Personal Data that yoboo collects, by itself or through third parties, there are: Trackers; Usage Data; email address; password; first name; last name; picture; language.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using yoboo.

Unless specified otherwise, all Data requested by yoboo is mandatory and failure to provide this Data may make it impossible for yoboo to provide its services. In cases where yoboo specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by yoboo or by the owners of third-party services used by yoboo serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through yoboo.

## Mode and place of processing the Data

### Methods of processing

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of yoboo (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

### Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

## The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent

activity, as well as the following: Hosting and backend infrastructure, Registration and authentication, Managing contacts and sending messages, Collection of privacy-related preferences and Registration and authentication provided directly by yoboo.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

### **Collection of privacy-related preferences**

This type of service allows yoboo to collect and store Users’ preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

#### **iubenda Privacy Controls and Cookie Solution (iubenda srl)**

The iubenda Privacy Controls and Cookie Solution allows the Owner to collect and store Users’ preferences related to the processing of personal information and in particular to the use of Cookies and other Trackers on yoboo.

Personal Data processed: Trackers.

Place of processing: Italy – [Privacy Policy](#).

### **Hosting and backend infrastructure**

This type of service has the purpose of hosting Data and files that enable yoboo to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of yoboo.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

#### **Google App Engine (Google Ireland Limited)**

Google App Engine is a hosting service provided by Google Ireland Limited.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: Belgium – [Privacy Policy](#).

#### **MongoDB Cloud (MongoDB, Inc.)**

MongoDB Cloud is a hosting and backend service provided by MongoDB, Inc.

Personal Data processed: Usage Data.

Place of processing: Germany – [Privacy Policy](#).

### **Managing contacts and sending messages**

This type of service makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

#### **Customer.io (Peaberry Software Inc.)**

Customer.io is an email address management and message sending service provided by Peaberry Software Inc.

Personal Data processed: email address; Trackers; Usage Data.

Place of processing: United States – [Privacy Policy](#).

### **Registration and authentication**

By registering or authenticating, Users allow yoboo to identify them and give them access to dedicated services. Depending on what is described below, third parties may provide registration and authentication services. In this case, yoboo will be able to access some Data, stored by these third-party services, for registration or identification purposes. Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

### **Auth0 (Auth0, Inc)**

Auth0 is a registration and authentication service provided by Auth0, Inc. To simplify the registration and authentication process, Auth0 can make use of third-party identity providers and save the information on its platform.

Personal Data processed: email address; first name; last name; password; picture; Trackers; various types of Data as specified in the privacy policy of the service.

Place of processing: European Union – [Privacy Policy](#).

### **Registration and authentication provided directly by yoboo**

By registering or authenticating, Users allow yoboo to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

### **Direct registration (yoboo)**

The User registers by filling out the registration form and providing the Personal Data directly to yoboo.

Personal Data processed: email address; first name; language; last name; password.

## **Information on opting out of interest-based advertising**

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

## **Further information about the processing of Personal Data**

### **Registration of personal notes, images and files**

Yoboo gives the User the opportunity to make personal notes that can only be consulted by the User and by a confidant designated by the User (the Coach).

### **Responsability**

The notes registered by the User are only stored by Yoboo in a secure manner but are not processed or used in the platform in any way. Yoboo is therefore responsible for the secure storage of this data, but is in no way responsible for the nature and form of the data.

### **Retention period**

The data will be kept indefinitely. The User can decide to no longer store all or certain data in Yoboo, or no longer share it with the Coach, by removing this data from the platform.

### **Automated decision-making**

Automated decision-making means that a decision which is likely to have legal effects or similarly significant effects on Users, is taken solely by technological means, without any human intervention. Yoboo may use the Users' Personal Data to make decisions entirely or partially based on automated processes according to the purposes outlined in this document. Yoboo adopts automated decision-making processes as far as necessary to enter into or perform a contract between Users and Owner, or on the basis of the Users' explicit consent, where such consent is required by the law.

Automated decisions are made by technological means – mostly based on algorithms subject to predefined criteria – which may also be provided by third parties.

The rationale behind automated decision-making is:

- to enable or otherwise improve the decision-making process;
- to grant Users fair and unbiased treatment based on consistent and uniform criteria;
- to reduce the potential harm derived from human error, personal bias and the like which may potentially lead to discrimination or imbalance in the treatment of individuals etc.;

- to reduce the risk of Users' failure to meet their obligation under a contract. To find out more about the purposes, the third-party services, if any, and any specific rationale for automated decisions used within yoboo, Users can check the relevant sections in this document.

## **Consequences of automated decision-making processes for Users and rights of Users subjected to it**

As a consequence, Users subject to such processing, are entitled to exercise specific rights aimed at preventing or otherwise limiting the potential effects of the automated decisions taken.

In particular, Users have the right to:

- obtain an explanation about any decision taken as a result of automated decision-making and express their point of view regarding this decision;
- challenge a decision by asking the Owner to reconsider it or take a new decision on a different basis;
- request and obtain from the Owner human intervention on such processing.

To learn more about the Users' rights and the means to exercise them, Users are invited to consult the section of this document relating to the rights of Users.

## **Analysis and predictions based on the User's Data ("profiling")**

The Owner may use the Personal and Usage Data collected through yoboo to create or update User profiles. This type of Data processing allows the Owner to evaluate User choices, preferences and behaviour for the purposes outlined in the respective section of this document.

User profiles can also be created through the use of automated tools like algorithms, which can also be provided by third parties.

To find out more about the profiling activities performed, Users can check the relevant sections of this document.

The User always has a right to object to this kind of profiling activity. To find out more about the User's rights and how to exercise them, the User is invited to consult the section of this document outlining the rights of the User.

## **Personal Data collected through sources other than the User**

The Owner of yoboo may have legitimately collected Personal Data relating to Users without their knowledge by reusing or sourcing them from third parties on the grounds mentioned in the section specifying the legal basis of processing.

Where the Owner has collected Personal Data in such a manner, Users may find specific information regarding the source within the relevant sections of this document or by contacting the Owner.

## **Preference Cookies**

Preference Cookies store the User preferences detected on yoboo in the local domain such as, for example, their timezone and region.

## **Cookie Policy**

Yoboo uses Trackers. To learn more, Users may consult the [Cookie Policy](#).

## **Further Information for Users**

### **Legal basis of processing**

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

### **Further information about retention time**

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

## **The rights of Users based on the General Data Protection Regulation (GDPR)**

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

### **Details about the right to object to processing**

**Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.**

**Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.**

### **How to exercise these rights**

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of yoboo or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

## **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, yoboo may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

## **System logs and maintenance**

For operation and maintenance purposes, yoboo and any third-party services may collect files that record interaction with yoboo (System logs) or use other Personal Data (such as the IP Address) for this purpose.

## **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within yoboo and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

## **Definitions and legal references**

### **Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Usage Data**

Information collected automatically through yoboo (or third-party services employed in yoboo), which can include: the IP addresses or domain names of the computers utilised by the Users who use yoboo, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User**

The individual using yoboo who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the Personal Data refers.

### **Data Processor (or Processor)**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner)**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of yoboo. The Data Controller, unless otherwise specified, is the Owner of yoboo.

**yoboo (or this Application)**

The means by which the Personal Data of the User is collected and processed.

**Service**

The service provided by yoboo as described in the relative terms (if available) and on this site/application.

**European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

**Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

**Tracker**

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

**Legal information**

This privacy policy relates solely to yoboo, if not stated otherwise within this document.

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