

Privacy Notice Improving a sleep stager based on HRV features on the detection of short awakenings

This privacy notice applies to the Personal Data processed in connection with Improving a sleep stager based on HRV features on the detection of short awakenings ('Initiative').

Last update: 15 September 2020

Who is the data controller?

Philips Electronics Nederland B.V.

High Tech Campus 52

5656AG Eindhoven, the Netherlands

What Personal Data are collected; Why are these Personal Data collected? With whom are Personal Data shared?; How long will the Personal Data be kept?

For this Initiative, your data was previously collected and stored in several databases, including: HHS, N2N, Siesta, Somnia, Retrospective insomnia, Insomnia home study, Healthbed.

What	Why	Whom	How long
Your previously collected data, including vital signs and clinical information: <ul style="list-style-type: none">• ECG• Respiratory effort• Motion data• Age (in years), BMI, sex• date and time stamps,• annotations of sleep stages• disorders	In order to build an HRV –based sleep staging algorithm, with specific attention to assess micro structural features of sleep, particularly short awakenings.	Philips	Periodic review every 5 years.*

*Periodic review: Philips will delete your data after a certain time, unless a clear reason exists why the data is still useful and relevant. Then again a periodic review cycle starts.

To protect your privacy, all directly identifying data (example: name, medical record number, contact details) will be separated from the research data (such as measurement data) and replaced by a participant code. On all study-specific documents, other than the signed consent form, you will be referred to by a participant code, not by name. Philips will only receive the research data.

Your participation in and any information you provide in relation to this initiative is confidential. Records identifying you will be kept confidential to the extent allowed by the law.

In addition to the information above, the following people might have access to records directly identifying you:

- Individuals performing the study;
- Individuals who have a business need to access your Personal Data, such as the personnel tasked with storing the signature forms;

Results may be published without disclosing your identity.

What is the purpose and legal basis of the processing?

Based on the legitimate interest Philips has, your Personal Data will be processed for the following purposes:

- to build an HRV –based sleep staging algorithm, with specific attention to assess micro structural features of sleep, particularly short awakenings.

Insofar as we have a legitimate interest, we may process your data for the following purposes:

- To conduct scientific research related to the initiative;
- For data analysis, for example, to improve the efficiency of the Initiative;
- For identifying usage trends, for example, understanding which parts of the Initiative is of most interest to users;
- To aggregate and/or anonymize Personal Data, so that it will no longer be considered Personal Data. We can do so to generate other data for our use, which we may use and disclose for any purpose;
- For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft;
- To enforce our terms and conditions and to protect our rights, privacy, safety or property of our affiliates, you or others;

To comply with legal obligations Philips may process or disclose your data for the following purposes:

- For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements;
- To comply with applicable law - this can include laws outside of your country of residence;
- To respond to requests from public and government authorities, these can include authorities outside your country of residence;
- To cooperate with law enforcement, for example law enforcement requests and orders;
- We may also process or disclose your data to protect your or someone else's vital interests.

With whom do we share your Personal Data?

We may disclose your Personal Data:

- To the parties specific to the initiative you take part in, as set out on page 1;
- Our affiliates or subsidiaries for the purposes in this privacy notice. Affiliates all process data under the same set of Binding Corporate Rules (www.philips.com/privacy);
- To our third party service providers who provide services such as website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, auditing and other services;

Security

We seek to use reasonable organizational, technical and administrative measures to protect personal data within our organization. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “How can you contact us?” section below.

What are your rights?

If you would like to:

- Ask questions about how we handle personal data;
- Request to review, correct, update, suppress or restrict the use of your personal data;
- Request that your personal data be removed;
- Withdraw your consent (Only possible if the processing is based on your consent. It will not affect the lawfulness of processing based on your consent before the withdrawal);
- Object to our use of your personal data for our legitimate business interests;
- Request to receive an electronic copy of your personal data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law),

please contact us via the details provided under the “How can you contact us?” section below. We will respond to your request consistent with applicable law.

In your request, please make clear what personal data you would like to have changed, whether you would like to have your personal data suppressed, or otherwise let us know what limitations you would like to put on our use of your personal data. For your protection, we only implement requests with respect to the personal data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we need to retain certain information for recordkeeping purposes (e.g., there could be legal obligations to retain certain information, if so, you are not be able to change or delete the personal data provided until after the retention period in that respect has passed).

Are you obligated to provide the data asked?

It is voluntary to provide the data requested in this notice.

If you fail to provide the information, this will mean that you cannot participate in this study.

Updates to this Privacy Notice

We may change this privacy notice. The “Last update” legend at the top of this privacy notice indicates when it was last revised. Any changes will become effective when the revised privacy notice is made available (online if it was already online, otherwise mail or email). If the change to this privacy notice is indicative of a fundamental change to the nature of the processing (e.g. enlargement of the categories of recipients or introduction of transfers to third countries) or a change that may be relevant to and impact upon you, then we will inform you in advance of the change taking effect in an explicit and effective way.

How can you contact us?

If you have any questions about this privacy notice or about the way Philips uses your personal data, please contact our Data Protection Officer via our [contact form](#) (www.philips.com/contactprivacy) or at

Philips Center HBT 16

Attn.: Data Protection Officer

P.O. Box 77900, 1070 MX

Amsterdam, The Netherlands

Alternatively, you have the right to lodge a complaint with a data protection authority for your country or region, or where an alleged infringement of applicable data protection law occurs.