

# PRIVACY STATEMENT

Version 1.1.0 – 2025-11-28

## The essence of our privacy statement

FAQIR Foundation considers it important that you know what happens to your (Personal) Data when you authenticate in the FAQIR Ecosystem and use the linked application Qwenda. That is why we have created this clear privacy statement. It describes who has access to your Personal Data, how it is stored, modified or deleted and how your Personal Data is handled in a secure manner, in compliance with Belgian and European law and applicable to the currently linked application Qwenda.

## The summary of our privacy statement

### We care about your privacy and value clarity!

Your journey as a user of Qwenda is of primary importance to us. That is why we want to inform you, so that it is clear to you how we process your Personal Data and what rights you have in that respect.

This brief summary of our privacy statement will get you up to speed in no time on how we process your Personal Data. Want to know more? Then we invite you to read our full privacy statement below, which explains everything in detail.

### What Personal Data do we collect from you and why?

We ask you to share the following Personal Data when using Qwenda:

- Your identification and contact information so that we can identify and contact you in connection with the functionalities of Qwenda, if necessary;
- Your date of birth so that we can verify that you have reached the age of 16;
- Personal Data concerning your health and health-related data, so that we can identify your needs and wishes concerning your health in accordance with the health modules available in Qwenda;
- Your choice of language so that we can customize the language of Qwenda to your needs.

We provide you the option to share Personal Data via specific modules:

- Personal Data regarding the use of medication so that we can monitor administration through Qwenda;

- Personal Data related to vaccinations or the context where and when a vaccination is relevant, so we can provide you with a personalized view on your vaccination status.

After the creation of your account, your consent and the Personal Data you have entered will be kept. By setting up a password known only to you or using the Itsme identity app, we ensure that only you can access your account and the data it contains.

## Who has access to your Personal Data?

Only you will have access to your Personal Data. FAQIR does not have access to your Personal Data or to your account.

By giving consent by accepting this privacy statement, you agree that FAQIR will have access to anonymous data. This means that FAQIR will have access to all anonymous data entered by each person who created an account, without being able to identify that person. Your account will therefore not be able to be directly linked to your person by FAQIR.

At FAQIR we work with technical service providers, but your Personal Data will not be made available to them or third parties without your knowledge or consent.

## What's in your hand?

- You may withdraw your consent at any time, without having to account for it. However, if you withdraw your consent, you will no longer be able to use Qwenda, the health vault and the health modules.
- At any time, you have the option to modify or delete your Personal Data within Qwenda. Additionally, you can also request us to change or remove your Personal Data at any time. To do so, simply send an e-mail to [support@faqir.org](mailto:support@faqir.org) following the steps outlined in article 5 of the full privacy statement below.
- You may ask us at any time to receive a copy of all your Personal Data that we have collected. To do so simply send an email to [support@faqir.org](mailto:support@faqir.org) following the steps outlined in article 5 of our full privacy statement below.
- You may contact us at any time with complaints, questions or concerns regarding the management and use of your Personal Data you may have. To do so, simply send an e-mail to [support@faqir.org](mailto:support@faqir.org).

## How do we protect your Personal Data?

- Your Personal Data is stored on a secure server in Germany and processed only in Belgium;
- We provide technical and organizational appropriate measures to process your Personal Data in a secure manner consistent with the GDPR.

We invite you to read our full privacy statement, which explains everything in detail.

## **PRIVACY STATEMENT QWENDA**

**V1.1.0 – 2025-11-28**

# Article 1 - GENERAL

## 1.1

This document concerns the privacy statement for FAQIR authentication and for Qwenda of:

FAQIR Foundation, a non-profit association under Belgian law, with its registered office at Volderrede 58, 9070 Destelbergen and registered in the Crossroads Bank for Enterprises under enterprise number 0789.225.256;

and

FAQIR Institute, a limited liability company under Belgian law, with its registered office at Koutergatstraat 2, 1703 Dilbeek and registered in the Crossroads Bank for Enterprises under enterprise number 0786.609.226;

Both of which are acting as independent controllers of processing under the terms of this Privacy Statement, and are collectively referred to in the Privacy Statement as "FAQIR."

## 1.2

The collection and processing of Personal Data is subject to strict conditions. FAQIR acts in accordance with:

- European Regulation 2016/679 of April 27, 2016 on the protection of personal data ("GDPR"); and/or
- All (future) Belgian laws implementing this Regulation.

## 1.3

FAQIR Foundation is the data controller for the processing of your Personal Data in relation to the creation of your account, the use of the health vault as a storage and data exchange system . FAQIR Institute is the controller for the processing of your Personal Data relating to the creation of your account as well as the use of all functionalities in the health modules in Qwenda.

## Article 2 - COLLECTED PERSONAL DATA.

FAQIR may collect Personal Data provided by you to the extent necessary or useful for the functioning of Qwenda and all modalities contained therein.

On the one hand, your Personal Data are collected for the creation of the FAQIR health vault. In addition, additional Personal Data are collected in the specific health modules available in Qwenda.

### 2.1 Personal data collected regarding the creation of your account and the FAQIR health vault

	Data	Details	Context
<b>Category 1</b>	your identification and contact information	Data concerning your identity, such as your full name, your gender, your date of birth, your phone number and email address, your language preference.	By providing this information when creating your account.
<b>Category 2</b>	your health and health-related data	Data regarding your health status and other health-related info, such as: your height and weight.	By providing this information when creating your account or when using the FAQIR health vault

### 2.2 Personal data collected regarding health modules.

	Data	Details	Context
<b>Category 2</b>	your health and health-related data	Data regarding your health status and other health-related info, such as: your medical conditions, your treatments and medication use and answers to specific health questions.	By completing this information when activating and using a health module.

## Article 3 - PURPOSE OF PROCESSING.

### 3.1 Personal data collected regarding the creation of your account and the FAQIR health vault

	Data	Legal Basis	Purpose
<b>Category 1</b>	your identification and contact information	Performance of a contract (Art. 6.1, b GDPR)	- To create your account on Qwenda; - To create your health vault

	Data	Legal Basis	Purpose
			within Qwenda; - To contact and identify you during your use of Qwenda. - To offer any optional Qwenda features and functionalities (see 3.3.).
<b>Category 2</b>	your health and health-related data	Performance of a contract (Art. 6.1, b GDPR) <i>and</i> Explicit consent (art. 9.2, a GDPR)	To create your health vault within Qwenda.

### 3.2 Personal data collected regarding health modules.

	Data	Legal Basis	Purpose
<b>Category 2</b>	your health and health-related data	Performance of a contract (Art. 6.1, b GDPR) <i>and</i> Explicit consent (art. 9.2, a GDPR)	-To record your health and treatment of certain conditions in Qwenda; -To record and monitor the use of medications as part of the treatment of certain conditions; -To improve Qwenda and ensure that you can make the best use of Qwenda.  - To offer any optional Qwenda features and functionalities (see 3.3.).

### 3.3 Optional features and functionalities.

To enhance the services provided by FAQIR, we may offer additional, optional functionalities and features within Qwenda that may involve the enrichment of your data and/or the exchange of certain data with third-parties.

It is important to note that such processing of your personal data shall only take place on your own initiative, for fulfilling the optional feature or functionality requested by you, and thus on the basis of your explicit acknowledgement or consent.

Data enrichment involves the collection of additional data (e.g., integrating external health information) to generate personalized guidance, deeper insights, or new features within the platform. Data exchanges involve the exchange of (certain) of your data, in minimized, pseudonymized or anonymized form, with third party-partners such as healthcare professionals (HCPs), research partners, or commercial partners.

In all such cases, FAQIR shall provide the necessary specific information regarding the purpose, the categories of data involved, and the identity/category of the partner as such events or features are requested or activated by you.

### 3.4 Legal obligations.

In exceptional circumstances, it may be necessary for FAQIR to disclose or transfer your personal data in response to a court order, a legally binding request from law-enforcement or regulatory authorities, or to comply with other mandatory legal obligations. FAQIR will make all reasonable efforts to notify you in advance of such disclosure, unless applicable law prohibits or restricts FAQIR from doing so.

## Article 4 - DURATION OF PROCESSING.

Your Personal Data will be retained and processed by FAQIR for the period we are required to do so by law or for as long as it is essential for the purposes of the processing or for the contractual relationship between you and FAQIR.

If FAQIR should become unable to retain your Personal Data, you will be notified and given the option to download your Personal Data.

If you do not exercise your right to erasure, your Personal Data will be retained for the following period:

	Personal data	Retention period
<b>Category 1</b>	your identification and contact information	Your Personal Data contained in Category 1 will be retained for five (5) years after the deletion of your account on Qwenda. Additionally, FAQIR requires you to make use of Qwenda at least once every five (5) years. Failing to do so will result in the deletion of your Personal Data contained in Category 1.
<b>Category 2</b>	your health and health-related data	Your Personal Data contained in Category 2 will be retained for five (5) years after the deletion of your account on Qwenda. Additionally, FAQIR requires you to make use of Qwenda at least once every five (5) years. Failing to do so will result in the deletion of your Personal Data contained in Category 2.

## Article 5 - YOUR RIGHTS

### 5.1 Right of access and information

You have the right to be informed about your Personal Data and the purpose of the processing of your Personal Data by FAQIR at any time.

## 5.2 Right of rectification, erasure and restriction

You are free to share or not share certain Personal Data with FAQIR.

You always have the right to request us to rectify your Personal Data. That being said, you can rectify your Personal Data yourself at any time.

You may also request that the processing of your Personal Data be restricted if you believe that your Personal Data is inaccurate, and you notify us thereof accordingly.

In addition, you have the right to request FAQIR to delete your Personal Data to the extent we are not in a position to make it anonymous.

If you refuse to share certain Personal Data with FAQIR or ask us to delete it, we may no longer be able to provide our services in an optimal manner.

## 5.3 Right to object

You also have a right to object to the processing of your Personal Data when you have serious and legitimate reasons for doing so.

You also have the right to oppose the use of your Personal Data for direct marketing purposes. In this case, no specific justification will be requested.

## 5.4 Right to data portability

You have the right to obtain your Personal Data processed by FAQIR in a structured, common and readable form and/or to transfer it to another data controller.

## 5.5 Right to withdraw your consent

You have the right to withdraw your consent at any time, without having to provide justification. The withdrawal of your consent does not affect your continued medical care in any way.

## 5.6 Automated decisions and profiling

You have the right to ask us not to make a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affects you.

The processing of your Personal Data by FAQIR will not be subject to automated processing or profiling without your explicit consent.

## 5.7 Exercise of your rights

You can exercise the aforementioned rights by contacting us through the designated method in Qwenda or by sending a written request via email to [support@faqir.eu](mailto:support@faqir.eu). Please

include sufficient identification data to be uniquely identified in Qwenda, and omit any irrelevant information

## 5.8 Right to file a complaint

If you are or were resident in the EU at the time your Personal Data was processed by us, and you do not feel happy about the way we handled your requests, you can always lodge a complaint with the Belgian Data Protection Authority, FAQIR's supervisory authority. However, we request that you first report your complaint to us at [privacy@faqir.org](mailto:privacy@faqir.org). That way we can come to an amicable solution by mutual agreement.

If after your notification you are still not satisfied with the processing of your Personal Data by FAQIR, you can still file a complaint with the Belgian Data Protection Authority:

Data Protection Authority  
Rue de la Presse/Drukpersstraat 35,  
1000 Brussels  
Belgium  
+32 (0)2 274 48 00  
[contact@apd-gba.be](mailto:contact@apd-gba.be)

If you are from an EU member state other than Belgium, you can also file a complaint with your national data protection authority (you can find a list of all data protection authorities within the European Union at [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)). This is without prejudice to a remedy before a civil court.

If you would suffer damages as a result of the processing of your Personal Data, you may bring a claim for compensation.

## Article 6 - SECURITY AND CONFIDENTIALITY

### 6.1

FAQIR has implemented appropriate security measures at technical, administrative and organizational levels to avoid the destruction, loss, corruption, alteration, unauthorized access or erroneous disclosure to third parties of your Personal Data, as well as any unauthorized processing of that Personal Data. However, in the event that - notwithstanding the measures taken by us - this would occur, and your Personal Data would be affected, FAQIR will inform you about the breach, including a description of the potential impact and a recommendation to mitigate the possible negative consequences of the breach.



## 6.2

In no event shall FAQIR be held liable for any direct or indirect damages resulting from an erroneous or unlawful use of your Personal Data by a third party.

## 6.3

You bear sole responsibility for maintaining the privacy and security of Qwenda, for example, by not allowing a third person to access the Personal Data you enter into Qwenda.

## 6.4

You alone are responsible for the use of Qwenda, for your IP address and identification data, as well as for their confidentiality. In any case you must immediately notify FAQIR of any unauthorized use of your account. You do this by sending an email to [support@faqir.eu](mailto:support@faqir.eu).

## Article 7 - APPLICABLE LAW AND COURT OF APPEAL

This Privacy Statement shall be governed, construed and enforced in accordance with Belgian law, which is exclusively applicable.

The courts of Ghent shall have exclusive jurisdiction to hear any dispute that may arise from the interpretation or implementation of this privacy statement.

## Article 8 - QUESTIONS OR DELIVERIES.

In case you have any questions or concerns regarding this privacy statement, please send us an e-mail to [privacy@faqir.org](mailto:privacy@faqir.org). We will make every effort to answer your questions.

Other contact information:

FAQIR Foundation  
Attn: Data Protection Officer  
Volderrede 58  
9070 Destelbergen  
Belgium  
[dpo@faqir.org](mailto:dpo@faqir.org)

FAQIR Institute  
Attn: Data Protection Officer  
Koutergatstraat 2  
1703 Dilbeek  
Belgium  
[dpo@faqir.eu](mailto:dpo@faqir.eu)