



## **Protecting your data while using Briometrix**

Briometrix is designed to source user generated content. What this means is that people generate our maps. This information then works as a guide to what you can and can't do when navigating using Briometrix. It also uses your individual fitness profile to make informed decisions about your body. It uses this information to assess your vulnerability to injury, ability in relation to a particular physical feature and to monitor your overall progress to fitness.

We also are committed to helping ethical medical professionals utilise data to help with conditions such as Parkinson's Disease, Multiple Sclerosis and Motor neuron disease. In this, we support programs such as [23 and Me](#).

However, Brio prides itself on being a company that is for the users by the users. We also recognise that the disability community has more than a few shades thrown over it in terms of rights breaches in the past. We're being completely transparent about Briometrix, our data usage and our third-party relationships.

## **Here's what Briometrix are doing to protect the data you create does not infringe on your right to privacy**

### **Using the GDPR as a standard**

More acronyms I hear you sigh. So **what is GDPR?** In brief the **General Data Protection Regulation** is a legal framework that sets guidelines for the collection and processing of personal information of individuals within the European Union (EU). **GDPR** will come into effect across the EU on May 25, 2018.

Our team wants to work with the world to ensure fitness and navigation for wheelchair users everywhere. We're an ambitious little start-up that believes we can help people in the Northern Territory, North America and beyond. What we've seen in the last few months with the GDPR has made us sit up and take notice. One of our directors, Eckhard Kemmerer, has family ties and a deep interest in Europe. Watching the GDPR formulate and implement in the European Union is interesting to us.

Eck often talks in terms of Briometrix solving "*the pointy end of the navigation problem*". By this, he means if you take the hardest part of a puzzle, such as ensuring a wheelchair can be mapped properly to aid in navigation, the benefits trickle down. If you solve the wheelchair navigation issue, it's easier for the next family pram, elderly person with a walking frame, parent with a small child and so on.

We also believe that abiding by the GDPR is solving the pointy end of the data treatment and privacy issue. We are committing to following the GDPR in the way we gather, share and display information. By choosing the toughest standard in the world as our benchmark, we can easily launch into America, Australia, Asia, Africa and countries outside the GDPR or EU as we've met the gold standard.

## **The right to be forgotten**

The GDPR includes an important component called “the right to be forgotten”. It means if you ever leave Brio as a product and/or you request it as a current user, we delete all your information.

It also means that the collection of your data will be there for you to manage. If you want to delete, limit or otherwise reduce the amount of data Briometrix collects for our usage or for third party usage, this will be permitted.

But that’s not all.

## **We will not profile you based on others**

One of the issues that has been contested in court by Belgium is using other people’s data to profile you. For example, Facebook tried to win the right to use your friends and family member data to profile you. This was even if you were not an active member or had never been a Facebook member. We don’t agree with this approach. In fact, we think it’s terrible that people that are not members of a data company such as Facebook are being profiled in that manner.

As a member of our service, your data will not be used to profile your team mates, friends with disabilities, your healthcare team or in the case of genetic conditions, your family. And even if you and your team mates do use Briometrix or if you introduce your children to it, we won’t be profiling you as a connected group without your permission, either.

## **Privacy through pseudonymisation**

People with disabilities often face strong scrutiny from insurance companies, the medical establishment and drug companies. At no time will any information you give us be identifiable to any third party.

We will be using pseudonymisation as standard for any data used outside your individual profile.

What this means is there will not be data collected that can in any way identify you as an individual member of our service. All records will use masking techniques to remove identification points, even if you agree to us sharing information with research groups or to strengthen the app and it’s features.

## **Transparent third-party disclosure**

Briometrix is committed to your privacy. We’re also committed to helping research groups improve treatments, outcomes and general health for people with disabilities. This means we may participate in research.

However, we make a commitment to our members to:

- Ensure you have the right to choose if your individual data is used through transparent disclosure of what is collected and how it is applied in a research setting
- Giving you the ability to review, erase, restrict usage and processing of, any data our company collects
- Never disclosing personal details that can identify you through pseudonymisation
- Fully disclose where data is shared and with whom, so you can make an informed decision
- Share the minimum amount of data required to conduct the research. This included but is not limited to only taking what is needed to perform the Brio tasks and sectionalising any data supplied to a third party on a “need to know” basis

- Take full responsibility for and maintain transparent relationships with any research partner or third party accessing data from us to ensure we know they are maintaining an agreed standard of privacy and usage
- Mapping the flow of any data we supply to a third party transparently and asking them to do the same, so we can make an informed decision about sharing it
- Not working with any company that cannot give a reasonable expectation that they too follow the GDPR principles, regardless of where they are operating from in the world
- Review and display our full privacy policy and conditions so that you as a member are always able to make an informed choice
- Ensuring our team is compliant always. We will be undertaking the certification offered under the GDPR as part of an overhaul of policy and procedure

Our aim is to lead the field on respecting the privacy of our members by following the GDPR standards. That way, we can all be assured your data and usage of our wheelchair app and tracker are given the respect they deserve.

### **Security and integrity**

Part of the GDPR also means complying with stringent policies in relation to the storage of data and the security of it in storage.

As part of our commitment to security and data integrity, we also agree to:

- Let you know of any individual, group or whole system breach that may leave your personal data, customer records or health records vulnerable as soon as we discover it
- We will be complying with the immediate escalation of any hack to the appropriate authorities within 72-hours window as set down by the GDPR, inclusive of successful and failed attempts
- Ensure your data is secure by using encryption and appropriate protocols
- Hiring a data protection officer that works as an independent member of the team with equal rights to the director team should the scale of Briometrix warrant it in future

### **Your data, your way**

By adhering to the standards of the GDPR, we know we are providing our members the gold standard in data usage and privacy in Australia. This is stronger than any privacy legislation or act on any state level. And we're happy to comply with its stringent controls.

Our compliance is because we care about our members. Yes, we want to go to Europe and be the wheelchair fitness app that athletes and everyday wheelchair users choose for themselves and their kids for decades to come. That is part of the reason.

We also want to be a shining light in treating members with proper respect and that includes not misleading or misusing what you share with us.

**If you have further questions about our commitment to ensuring the integrity of your personal data and/or how Brio works, please contact us directly. We're more than happy to discuss it with you.**