



# Privacy Policy, GDPR Compliance & Data Processing Addendum (DPA)

## 1. Introduction

UMA and The HCI Solution, Inc. (“we”, “our”) provide enterprise mobile applications for operational and healthcare environments. This document defines privacy practices, GDPR compliance, and data processing responsibilities.

## 2. Roles (GDPR Art. 4, 28)

We act as a Data Processor. The Customer is the Data Controller and determines purpose and means of processing.

## 3. Legal Basis (GDPR Art. 6)

Processing is based on contractual necessity, legitimate interests, and legal obligations. Consent is used where required.

## 4. Data Collected

Personal data (name, user ID), device data (device ID, OS), operational logs, and healthcare-related identifiers where applicable.

## 5. Security Measures (GDPR Art. 32)

- TLS/SSL encryption - Role-based access - API token authentication - Audit logging - Infrastructure-level encryption

## 6. Data Processing Addendum (DPA)

We process data only under instruction, ensure confidentiality, and require subprocessors to meet equivalent safeguards.

## **7. Subprocessors**

Cloud providers and infrastructure vendors are used under contractual agreements with data protection obligations.

## **8. International Transfers (GDPR Chapter V)**

Transfers outside EEA use Standard Contractual Clauses (SCCs) or equivalent safeguards.

## **9. Data Subject Rights**

Access, rectification, erasure, restriction, portability, and objection rights are supported via the Data Controller.

## **10. Mobile & API Data Handling**

Device identifiers, tokens, and API interactions are logged securely. Tokens are time-limited and protected.

## **11. HIPAA Considerations**

When applicable, systems support HIPAA compliance with administrative, technical, and physical safeguards.

## **12. Retention**

Data is retained only as necessary for operations, compliance, and audit requirements.

## **13. Breach Notification (GDPR Art. 33)**

In the event of a breach, notification will occur without undue delay per regulatory requirements.

## **14. Compliance (Apple / Google)**

No sale of personal data. Data collection minimized. Transparent usage and secure handling enforced.

## **15. Contact**

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