

Bron: https://www.braunhealthcare.com/us_en/braun-family-care-app-privacy-policy/#open

Privacy Policy for the Braun Fever App and Connected Braun Thermometer

1. Introduction

Welcome to the Privacy Policy for the Braun Fever mobile application (the “Braun Fever App” or the “App”) and connected Bluetooth or Wi-Fi-enabled Braun thermometers (“Braun Thermometers”). This Privacy Policy is intended for App users (“users” or “you”), including parents or other caregivers. This Privacy Policy explains how information is collected, used, shared, maintained, and protected by Helen of Troy and/or its affiliates (referred to as “Helen of Troy” or “we” or “our,” and including our respective employees and contractors) when you use the App and a connected Braun Thermometer.

The Braun Fever App is a mobile device application that allows users to connect to their Braun Thermometers. It will allow for two-way communication to the Braun Thermometers, allowing the device to relay information for the reading to the App and cloud. It will also allow the App to give firmware updates to the device as well give information added in directly to the App. The App will allow users to assign measurements to profiles and will display a timeline of past measurements and other events. The App will allow the user to share data of individual profiles to other accounts via access to their timeline. Users can also choose to share information with their selected health care providers. The App will also provide guidance for taking proper temperature measurements, as well as guidance on next steps based on the readings that have been taken and other events that have been added. This App will be able to connect to the connected series of thermometers including IRT6575, IRT7000, and BNT450. Information will be communicated from the Braun Thermometers to the App and the cloud as well as directly from the App to the cloud to be saved and used by users and Helen of Troy.

Please read this Privacy Policy carefully and be aware that by accessing and using the App and accepting this Privacy Policy, you agree that you have read this notice and that you accept and consent to the practices described here. [Use of the App is also governed by and subject to the Terms & Conditions of Use (“Terms of Use”) [].] [Additionally, to use the App, you must accept the User Consent for Use & Disclosure of Information (“User Consent”) [], which authorizes certain uses and disclosures of information related to your use of the App and the Braun Thermometer.] **USE OF THIS APP AND A CONNECTED BRAUN THERMOMETER IS NOT A SUBSTITUTE FOR MEDICAL ADVICE FROM A TRAINED PROFESSIONAL. IF YOU OR SOMEONE IN YOUR CARE IS IN MEDICAL DISTRESS, PLEASE SEEK IMMEDIATE MEDICAL ATTENTION.**

If you are located in the European Economic Area (“EEA”) or United Kingdom (“UK”) and your personal data (as defined below) is subject to Regulation (EU) 2016/679 General Data Protection Regulation (“EU GDPR”) or the EU GDPR as it forms part of the laws of the United Kingdom by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by the Data Protection, Privacy and Electronic Communications (Amendments etc.) (EU Exit) Regulations 2019 (the “UK GDPR”, and, together with the EU GDPR, the “GDPR”) please see Section [8] below for additional disclosures and a description of your rights under the GDPR.

2. Personal Information Collected in Connection with the Braun Fever App

Through your use of the App, the Braun Thermometer, and your communications with us, Helen of Troy collects certain Personal Information. For purposes of this Privacy Policy, “Personal Information” means information that we directly or indirectly associate with a specific person, or that can

reasonably be used to identify a specific person, such as a name, address, phone number, or email address. As explained in greater detail below, Personal Information includes: (1) information you provide through use of the App; (2) information collected through use of a Braun Thermometer linked to the App; (3) information you provide in communications with us outside the App, [such as by contacting our toll-free help line]; (4) information you provide in response to surveys; (5) information that we automatically collect, such as information collected through the use of cookies.

- **Information You Provide Through Use of the App.** [The App prompts you to provide certain information when you first download and open the App to create an account.] When you create your account on the App, you will be asked to provide information such as your name, gender, [date of birth/age], and email address (“Account Information”). [We will use your Account Information for purposes such as maintaining your account and enabling you to use the App.]

After you create an account, you will be prompted to create at least one and as many as [X] profiles within the App for individuals whose temperature measurements will be taken with a linked Braun Thermometer. You may add information to these profiles such as the individual’s [name, age, gender, race, height, weight, allergies, and vaccination records] (collectively “Profile Information”). [We will use the Profile Information you provide for purposes such as enabling you to use the App to record temperatures and other information through the App for one or more individuals.]

When you activate a Braun Thermometer to take a temperature, you will be prompted to select the profile for the individual whose temperature is being measured. After you measure the temperature, you may use the App to add information to the profile through drop-down menus or open text fields to supplement the temperature measurement, such as information about [symptoms, medications administered at particular times, and diagnoses]. [The recorded temperature and any such additional information you provide will be referenced together as the “Event Information.” We will use Event Information to support your use of the App and for other purposes such as improving our existing products and services and developing new products and services.]

You also have the option to link media stored locally on your smartphone, such as photographs or video, to a particular temperature measurement stored in the App (“Locally Stored Media”). Any such photographs, video, or other media will remain stored locally. This means that it will not be uploaded to our servers and other caregivers to whom you have provided access to [the relevant profile/your account] will not be able to see any such photographs, videos, or other media.

- **Information Collected Through Use of a Braun Thermometer.** When you use a Braun Thermometer that is connected to the App to take a temperature measurement, that measurement is collected and stored in the App [and sent to the cloud]. We also collect information related to the function of the Braun Thermometer that is connected to the App, such as whether the night mode function is on, if the probe cover is on or off, and the time it takes to pair the device with the App. [This information is used for purposes such as identifying and fixing bugs as well as to improve the features and functionality of the App and Braun Thermometers.] [The Braun Thermometer may also contain sensors that collect additional information, such as heart rate, blood oxygen level, ambient temperature, and ambient light.]
- **[Information You Provide [to the Braun Fever App Helpline]].** You may speak with [Braun Fever App representatives] by calling the [Braun Fever App Helpline]. You may provide information to the representative such as [your contact information and information relating to your use of the Braun Thermometer or the App]. [Any information you provide to the

Braun Fever App representative during these calls may be collected and stored. We may use information you provide during these calls for purposes such as [supporting your use of the App and Braun Thermometers].]

- **Information You Provide in Response to Surveys.** From time-to-time, we may also ask you to provide information about [your experience with the App and Braun Thermometers] through surveys. We will use your responses for purposes such as [helping us improve the App and Braun Thermometers, as well as related services.]
- **User and Device Information That We Automatically Collect.** We collect certain technical information automatically (“Technical Information”). For example, when you use the App, we may collect information about your activity in the App, such as [pages] visited, tutorials watched, what features you are using, and your use of the search function. We may also collect information about how and when you are using the App, such as time stamps for opening and closing the App, how frequently you are using the App, and [whether your App use is connect to a particular episode of illness you logged in the App]. We may also collect information related to in-App errors, as well as crash analytics. Additionally, we may collect information directly from the smartphone on which the App is running, such as Internet Protocol (IP) address, device identifiers, country, language, and whether the device is connected to the cloud. [We may use this Technical Information for purposes such as identifying and fixing bugs and other problems users are encountering, as well as to improve the features and functionality of the App and Braun Thermometers.]
 - **Cookies.** We may place cookies or other similar technologies on your smartphone. We may use these technologies for purposes such as [helping us understand how the App is used, improving the App, and personalizing your App experience.] [While the App does not respond to web browser “do not track” signals, we do not track (nor do we permit third parties to track) your online activity over time across third-party websites.]

3. How We Use and Share Your Personal Information

In general, we use and share Personal Information as permitted or required by applicable laws, rules, or regulations, and for purposes relating to the operation and continued development of the App and Braun Thermometers. We may use and share Personal Information for management and administration purposes. [We do not sell Personal Information to third parties.] We may use and share Personal Information as follows:

- **To Provide, Maintain, and Improve the App and Related Services for You.** We may use and share Personal Information to provide services to you through the App or otherwise, as well as to support the App and Braun Thermometers, and improve their features and functionality. We may share Personal Information with trusted vendors that we use to provide services related to the App and Braun Thermometers (including, for example, our cloud storage provider).
- **[With Your Consent.** We may use and share Personal Information as allowed under any permission you may provide [including the User Consent []].
- **To Communicate With You.** We may use your Account Information to send you notifications through the App and to respond to you when you contact us.

- **To Comply With the Law.** We may use and share Personal Information with third parties if we believe that an applicable law, rule, or regulation requires us to do so, including to comply with a subpoena, search warrant, or similar legal process.
- **To Protect Our Legal Rights and Prevent Harm.** We may use and share Personal Information with third parties to establish, protect, or assert our legal rights, or to defend against legal claims. We may also use and share Personal Information with third parties when we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the physical safety of any person.
- **[To Inform Third-Party Partners of Survey Results.** We may share your responses to surveys with third-party partners to keep them informed regarding industry trends.] [When we request that you complete a survey, we will include information regarding any third-party partners with whom we will share the results.]
- **To Investigate Suspected Wrongdoing.** We may use and disclose Personal Information with third parties when we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the physical safety of any person.
- **To Create De-Identified and Aggregated Data.** [Insert description of how you create and use data that has been de-identified and/or aggregated.] [We hold all rights, title, and interest in and to de-identified data. We reserve the right to use and share de-identified data (regardless of whether it has been aggregated) for any purpose, in our sole judgment.][For instance, we may use and share [aggregated and/or de-identified] data for the following purposes:
- - **To Improve the App.** We may use and share de-identified data to evaluate the effectiveness of the App, identify trends, and improve operations related to the App.
 - **To Conduct Research.** We may use de-identified data for research, including analytics and product development. Analytics is the process of examining data to draw conclusions from that information. We may also share de-identified data with third parties for research and analytics purposes.]
 - **To Support Public Health.** We may use and share de-identified data for public health purposes [and to provide trends].
- **In Connection with Organizational Changes.** We may use and share Personal Information with third parties if [Helen of Troy or any of its affiliates] is involved in a merger, acquisition, sale of all or a portion of its assets, or other restructuring.