WinWin4WorkLife (WW4WL) General Privacy Policy

Version: 1.0.2
Date: 30 jan 2025

WW4WL is a label of MOTUS. As such, the WW4WL project adheres to the MOTUS General Privacy Policy outlined below. A more detailed Privacy Declaration specific to the study within WW4WL is provided in the application(s) after you log in.

MOTUS General Privacy Policy

With MOTUS, we invite users (the "Respondents") to participate in a study (the "Study"). Studies involve completing questionnaires, diaries, and, depending on the study, capturing external/sensor data. During the Studies, communications can be sent to Respondents via email and notifications to support the Respondents' tasks in completing a Study. Each study has a predetermined duration and participation is voluntary. Studies may offer personal feedback to Respondents.

Studies are designed and conducted by hbits CV (Witte Patersstraat 4, 1040 Etterbeek, Belgium). hbits CV is a spin-off of the Research Group BRISPO of the Vrije Universiteit Brussel (VUB), Pleinlaan 2, Brussels, Belgium, under the MOTUS license agreement. In addition to hbits CV and VUB, third parties can also use MOTUS as a Software as a Service to design and conduct studies.

Your privacy is very important to us. Before we get into the details, please review our Privacy Label for a summary of our privacy practices. Below the Privacy Label, you will find the full policy. This Privacy Policy applies when hbits CV is the Data Controller or Joint Data Controller (together with the VUB).

Privacy Label

Collection of data	
- Do we manage, store and process your Personal data during the study?	Yes
- Do we manage, store and process your Personal data after the study?	No

- Do we use external plugins to collect, manage, store and process Study data?	No
- Do we collect, manage, store and process User data?	Yes
Cookies	
- Do we use cookies?	Yes, but only first party cookies
Tracking	
- Do we track your device location when you use MOTUS?	Yes, with your consent
- Do we track your device location when you are not using MOTUS actively?	Yes, with your consent
Camera	
- Do we make use of the camera of your device when you use MOTUS?	Yes, with your consent
Processing of data	
- Do we pass on your Personal data to research partners?	No
- Do we pass on your Personal data to commercial companies?	No
- Do we pass on your Study data to research partners?	Yes
- Do we pass on your Study data to commercial companies?	No
- Do we pass on your Sensor data to research partners?	No
- Do we pass on your Sensor data to commercial companies?	No
- Do we pass on your User data to research partners?	No
- Do we pass on your User data to commercial companies?	No
- Do we process Study data to aggregated information?	Yes
- Do we share or sell aggregate information?	Yes
- Do we use your Study data to apply for research funding?	Yes
Privacy and Control	
- Can someone else see your data in MOTUS?	No
- Can you control the privacy settings in MOTUS?	Yes
- Can you exercise your rights under GDPR?	Yes
- Can you make a complaint?	Yes

Privacy Policy

The MOTUS Privacy Policy (the "Privacy Policy") covers the MOTUS platform, initially developed by the Research Group BRISPO at Vrije Universiteit Brussel (VUB) and further advanced by hbits CV since 2018. MOTUS is used for scientific data collection through surveys and diaries. It may request access to location information, the camera, and files on your device.

Participation in Studies requires the Respondent's consent, including consent for scientific research, which is a primary purpose for processing Personal data. In some cases, data processing is based on public interest or official functions.

This Privacy Policy details how Personal data, Study data, Sensor data and User data are stored, preserved, and processed. Respondents use MOTUS via smartphones, tablets, or computers, and data may be captured through sensors or API-links, though no API-links transmit data to external databases.

When the Privacy Policy references MOTUS, it encompasses the MOTUS platform including the MOTUS back-office, the MOTUS applications together with the MOTUS architecture holding the databases.

DATA CONTROLLER, JOINT DATA CONTROLLER, DATA PROCESSOR

hbits CV acts as Data Controller for Personal data it collects. In joint studies with VUB, hbits CV is a Joint Data Controller. In both scenarios, the MOTUS Privacy Policy governs hbits CV's data handling. For client-contracted services, hbits CV functions as Data Processor, with the client's Privacy Policy governing these cases. hbits CV employs a Data Protection Officer (DPO) and an external legal advisor to oversee data processing.

MOTUS and its services are overseen by the executive board of hbits CV. The Managing Director, Joeri Minnen, can be contacted at Joeri.Minnen[at]hbits.io or +32 497 18 95 03. Each study has a designated Data Manager, whose contact details are provided for each specific study. Alternatively, they Data Manager can be reached via the general email address datamanager[at]hbits.io.

SCOPE AND ACCEPTANCE

The Policy applies to all identifiable data collected by MOTUS. By using MOTUS or providing personal data, respondents consent to this Privacy Policy. If you do not accept the Privacy Policy, you cannot use MOTUS or provide data.

COLLECTION OF DATA

MOTUS collects, manages, stores, and processes data from respondents using various methods such as surveys, diaries, and tracking activities. Only the data necessary for each specific study is collected. Personal data is used for registration and invitations, study participation, communication to support participation, creating group profiles, and verifying the use of confidential information.

Data types include:

- **Personal Data:** Used for identification, contact, and access. Includes first name, last name, gender, date of birth, language, contact details (email, postal, telephone), and device tokens.
- **Study Data:** Captures behaviors, opinions, and values through surveys and diaries. With consent, data may also be obtained from other sources, such as administrative databases.
- **Sensor Data:** Employs signals from sensors in devices, processing and presenting this data to respondents in the MOTUS applications as tentative entries for editing and use in time or expense diaries. MOTUS applications can ask to: o Provide consent to and accordingly perform foreground tracking o Provide consent to and accordingly perform background tracking o Provide consent to the use of the camera to take pictures or scan documents and receipts
    - o Provide consent to enter the photo app and the files app to select and upload pictures and documents or receipts
- **User Data:** Collected during interactions to enhance service quality and communication. Information is gathered on when respondents use MOTUS and which devices and operating systems they use. Consent is requested to allow MOTUS to send notifications based on the device token, making use of a third-party submitter.

Consent can be activated or deactivated at any time through the app settings on the Respondent's device. The status of consent does not affect the Respondent's ability to participate in a Study.

COOKIES

MOTUS uses first-party cookies for site functionality and user experience. Types include necessary cookies (being: session cookies and permanent cookies). Third-party cookies are not used.

META DATA

Labels and metadata are added to data for enhanced analysis.

COMMUNICATION DATA

Records of communications, including emails and notifications, are time-stamped.

TRANSACTION DATA

Transaction data related to respondent compensation is retained for legal compliance, but account information is not stored.

PROFILE DATA

Profile information is collected for managing contact details but not for personal profiling.

CHILDREN'S PERSONAL DATA

MOTUS does not knowingly collect data from children under 16. If discovered, such data will be removed. Collection from children under 16 is only with explicit parental or guardian consent.

PURPOSE OF DATA COLLECTION

MOTUS aims to collect data to understand behavior, opinions, norms, and values. Data collections are linked to a specific research question. Research questions come from various entities and span multiple disciplines. Research uses pseudonymized or anonymized data to ensure respondent anonymity.

DATA STORAGE

MOTUS employs EU-based Virtual Private Servers (VPSs), accessible only to authorized personnel. The servers and databases are customized for high security. ISO27001 certification ensures adherence to security and data protection standards. Access is controlled by Two-Factor Authentication (2FA), and role-based access governs study entry for the MOTUS back-office.

DATA RECIPIENTS

hbits CV does not rent, sell, or share Personal data for financial gain.

Data is shared only to fulfill agreements, under legal obligations, to represent legitimate interests, or with explicit consent. Study data shared with third parties include only a subset of the Study data and can be supplemented with user data, pseudonymized data, or anonymized data. No sensor data is shared. The data provided has to be relevant to the

specific research question outlined in the data-sharing agreement, which details the terms, use, and duration of data access and/or storage.

Anonymized personal data is recoded in a manner that prevents individual identification. If an anonymous digital key is added, allowing personal data to be re-identified later, this process is known as pseudonymization. Pseudonymization may be employed when future databases are needed for research to monitor changes at the Respondent level and within the combined Study data.

hbits CV may generate individual results for respondents and aggregate results for public display on a website or in scientific articles.

DATA RETENTION

Data are anonymized for scientific research and retained for up to ten years, unless otherwise specified. If follow-up surveys are needed, Personal data are pseudonymized and stored separately.

RIGHTS REGARDING PERSONAL DATA

Under GDPR, individuals have that empower individuals to control their data. These rights are:

- Access: Request information about what Personal data is being held and inquire about the source of the data if it was provided by a third party. Respondents can download all their data held by MOTUS through the settings menu of the MOTUS applications, available in a JSON file format.

- Rectification: Ask for corrections to any incorrect personal data. Respondents can contact either the MOTUS Data Manager or the designated contact for the specific Study.

- Objection: Object to the processing of their data. Respondents can contact either the MOTUS Data Manager or the designated contact for the specific Study.

- Data Portability: Request that their data be transferred to third parties or obtain a copy in a readable or machine-readable format. Respondents can download all their data held by MOTUS through the settings menu of the MOTUS applications in JSON file format, which can then be converted to another format if desired.

- Automated Decision-Making: Be informed about any automated decision-making processes and, if profiles are created based on this, understand the underlying principles, significance, and consequences. Respondents can contact either the MOTUS Data Manager or the designated contact for the specific Study.

Erasure: Request to be 'forgotten' by the organization, subject to certain conditions. Respondents can contact either the MOTUS Data Manager or the designated contact for the specific study.

FURTHER QUESTIONS

For questions about the Privacy Policy within a Study, your rights, or data processing, contact the MOTUS Data Manager at datamanager[at]hbits.io.

COMPLIANCE AND COMPLAINTS

The Data Protection Authority (DPA) oversees privacy legislation and handles complaints. Contact details are:

- **Address:** Drukpersstraat 35, 1000 Brussels
- **Phone:** +32 2 274 48 00
- **Email:** contact@adp-gba.be
- **Website:** www.gegevensbeschermingsautoriteit.be • **Complaint Form:** https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen

For hbits-related issues, contact the Data Protection Officer at dpo[at]hbits.io.

For VUB-related issues, contact the Data Protection Officer at dpo[at]vub.be.