1. US/Canada PRIVACY POLICY

We are very delighted that you have shown interest in our enterprise. Data protection is of a particularly high priority for the management of Bioniks. This privacy policy outlines what personal data that is being collected and how it is used in the operations of the Kinetigram platform, either obtained from the evaluator (user) or data subject (patient). We collect only the data that is necessary either for authentication (login to the application) or motion assessment.

The processing of personal data shall always be in accordance with the country-specific data protection regulations applicable to Bioniks. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

Bioniks has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed through the Kinetigram application and cloud infrastructure.

1. **Consent**

By using our Kinetigram platform, you hereby consent to our Privacy Policy and agree to its terms.

2. **Collection of General Data and Information**

The personal data collected for operations of Kinetigram platform include two types of data: (1) user data and (2) subject/patient data.

User data pertains to data needed to identify and authenticate a user for access to Kinetigram application, including:

- First and last name*
- Job title (optional)
- Email address
- Username*
- Institution affiliation (site/tenant identifier) *

These data are managed by Bioniks via Microsoft Azure B2C Identity Service. Azure B2C is an identity management service that enables signing up, signing in, and managing login profiles (More information is available at: https://docs.microsoft.com/en-us/azure/active-directory-b2c/).

Data marked (*) are also retained in the tenant database for the customer collected data.

Subject/patient data collected by the Kinetigram include the following information:

- Subject alpha-numerical identifier (pseudonymized)
- Affiliation to a site/tenant identifier

- Gender
- Height
- Weight
- Hand dominance
- Arm measurements (body segment lengths)
- Login session information (logged user, date and time of login/logout)
- Measurement session data (date, time, user performing assessment, parameters of assessment, notes etc.)
- Kinect frame data (timestamp, 25 tracked joint positions in three dimensions: x, y, z, visibility flag etc.) and other motion data
- Processed motion data (reachable workspace parameters, functional workspace information, range of motion etc.).

This data is stored in our cloud servers. Although Kinetigram uses a Kinect sensor consisting of color and infrared cameras, the Kinetigram does not store or transmit any audio or video information to Bioniks. To obtain the raw motion data , the infrared camera data are processed locally by the Microsoft Kinect Runtime and provided as 3D joint positions to Kinetigram application.

Note: When using the Kinetigram with a Kinect for Windows v2 sensor, Microsoft will collect telemetry data (e.g., operating system, number of processors, graphic chipset, memory, device type, locale, time) in order to improve Microsoft products and services. The data will not be used to identify specific individuals.

Additional data on the application activities are collected in various cloud and local log files that provide operational support for the Kinetigram infrastructure. The log files do not contain personal information. Examples of such information may include: (1) clinical site identifier, (2) database identifiers, (3) Internet protocol address (IP address), (4) time and type of API calls, and other operational metadata. When using these general data and information, Bioniks does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content correctly, (2) optimize the content, (3) ensure the long-term viability of our information technology systems and cloud technology, and (4) cooperate with law enforcement or similar investigations by responding to subpoenas, search warrants, or other lawful requests for information that we receive. Therefore, Bioniks may analyze anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise. The anonymous data of the server log files are stored separately from all personal data provided by a data subject. The operational logging data are typically preserved for up to 30 days.

3. **Use of General Data and Information**

We use the information we collect as part of a clinical trial. As such, privacy concerns should be directed to the study sponsor.

4. **Third-party Data Sharing**

We may be contractually obligated to share personal data with our third-party clinical study partners according to the study protocol. Subjects would be notified of such sharing during their consent process. Bioniks does not share data with other third-party entities.

5. **Children's Information**

Children may be data subjects in a clinical study conducted by the trial sponsor. In such case, Bioniks may collect health data of children according to the study protocol. Unless children are part of the study, Bioniks does not knowingly collect information on people under the age of 18. If you think that your child provided this kind of information, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity.

6. **Changes to Privacy Policy**

In the event that material changes are made to this applicable privacy policy, we will notify users via email.

7. **Contact Us**

If you have any questions about our privacy practices or this Privacy Policy, please contact us at:

Bioniks
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United States of America
Tel: +1-510.747.1947

Email: info@bioniks.net

Last review of this Privacy Policy: Nov 3, 2026