

Privacy Policy

Last updated: [30 May 2025]

At **Viti Science AB** (“we”, “us”, “our”) we are committed to safeguarding your personal data and ensuring full transparency about how we handle it. This Privacy Policy explains **what data we collect, why we collect it, how long we keep it, and the choices you have** when you use our survival-extrapolation software, **extRpolateS** (“the App”).

1 Who We Are

Role	Details
Controller	Viti Science AB
Reg. No.	559379-5510
Address	Stopvagen 91, 168 36 Stockholm, Sweden
E-mail	mate.szilcz@vitiscience.se
Data-Protection Officer (DPO)	Mate Szilcz, mate.szilcz@vitiscience.se, +46 (0) 72 – 171 95 05

If you believe we are not handling your data lawfully, you also have the right to lodge a complaint with the Swedish supervisory authority: **Integritetsskyddsmyndigheten (IMY)**, imy@imy.se, www.imy.se.

2 What Data We Collect

Category	Typical items	Source
User-Account Data	Name, e-mail, organization, hashed password, roles/preferences	You
Usage & Technical Data	IP address, device/browser, pages visited, error logs, time stamps	Automatic
Uploaded / Generated Data	Digitized KM curves, reconstructed or empirical IPD, model settings, exported outputs	You / the App
Cookie & Tracking Data	Session cookies (necessary), analytics cookies (optional)	Automatic

Important: We do **not** require identifiers such as patient names, IDs, addresses, or dates of birth. If you upload real IPD containing personal data, **you** must have a lawful basis and remove direct identifiers wherever possible.

3 How & Why We Use Your Data (Purposes and Legal Bases)

Purpose	Legal basis (Art. 6 GDPR)	Examples
Provide and secure the App	Contract (Art. 6 (1)(b))	Account creation, authentication, processing your uploads, storing projects
Improve functionality, fix bugs, generate aggregated statistics	Legitimate interest (Art. 6 (1)(f)) – we balance our interest with minimal impact on your privacy	Analytics of feature adoption, performance metrics
Send service e-mails (e.g., security or downtime notices)	Legitimate interest	Mandatory notifications
Send marketing newsletters	Consent (Art. 6 (1)(a)) – opt-in only, may be withdrawn at any time	Product news, webinars

You may withdraw consent at any time without affecting the lawfulness of processing before withdrawal.

4 Cookies & Similar Technologies

We use:

- **Essential cookies** (session/authentication) – required for the App to work.
- **Analytics cookies** (Matomo Cloud, opt-in) – help us understand feature usage.

You can manage non-essential cookies through our cookie banner or in your browser settings.

5 Data Storage & Security

- **Hosting locations**
 - **AWS eu-north-1 (Stockholm)** – encrypted object storage (Server-side encryption with Amazon S3 managed keys (SSE-S3)).
 - **Microsoft Azure EU** – application servers & databases.
- **Transmission security** – TLS 1.2+ for all traffic.
- **Role-based access control** & least-privilege IAM.
- **Regular penetration tests**, vulnerability scans, and server hardening.
- **Authentication & Access Control**
- We use Auth0 (EU tenant) to manage user identities. All credentials are stored with Auth0, never on our servers.
- - Mandatory TLS 1.2+ connections to Auth0
- - Mandatory two-factor authentication (2FA) via TOTP or WebAuthn
- Auth0 acts as our sub-processor under a GDPR-compliant DPA and SCCs.

6 Data Sharing & Sub-Processors

We do **not** sell personal data. We share it only with vetted service providers under EU-standard contractual clauses (SCCs) or EU/EEA locations:

Category	Provider	Location	Purpose
Cloud infrastructure	Amazon Web Services	Stockholm (eu-north-1)	File storage, database backups
Application hosting	Microsoft Azure	North Europe	Compute & managed PostgreSQL
Identity & SSO	Auth0 (Okta)	EU	User authentication & 2FA

We enter a Data-Processing Agreement (DPA) with every sub-processor.

7 International Data Transfers

If support staff outside the EEA access minimal data to resolve incidents, we rely on **SCCs (2021/914/EU)** plus supplementary security measures (encryption, access logging).

8 Data Retention

Data type	Retention rule
Account data	While your account is active + 6 months, then hashed anonymisation
Uploaded / generated project data	Until you delete it or 24 months after last access, whichever is earlier
Logs & backups	90 days (logs), 30 days (encrypted backups)
Marketing consents	Until withdrawn + 12 months for audit trail

9 Your Rights

- **Access** – obtain a copy of personal data we hold.
- **Rectification** – correct inaccurate data.
- **Erasure** – delete data (“right to be forgotten”).
- **Restriction** – limit processing under certain conditions.
- **Portability** – receive data in CSV/JSON and transmit to another controller.
- **Objection** – to processing based on legitimate interests or direct marketing.
- **Withdraw consent** – at any time where processing is based on consent.

To exercise any right, contact our DPO at [mate.szilcz@vitiscience.se]. We respond within one month (Art. 12 GDPR). You may also complain to **IMY** if you feel your rights are infringed.

10 Automated Decision-Making

We do **not** carry out automated decision-making or profiling that produces legal or similarly significant effects on you (Art. 22 GDPR).

11 Children’s Data

The App is **not directed to children under 16**. We do not knowingly collect personal data from children. If you believe a child has provided us with personal data, please contact us and we will delete it.

12 Data Breach Notification

In the unlikely event of a personal-data breach, we will notify the competent supervisory authority within 72 hours and affected users without undue delay, in accordance with Articles 33–34 GDPR.

13 Changes to This Policy

If we change how we process personal data, we will update this document and notify registered users by e-mail at least 30 days before changes take effect. The version number and date appear at the top of this page.

14 Contact

Viti Science AB – Privacy Office

Address: Stopagen 91, 168 36 Stockholm, Sweden

E-mail: mate.szilcz@vitiscience.se

Phone: +46 (0) 72 – 171 95 05