

PRIVACY & POLICY

1. Introduction

1.1 As Ocutune is still in the start-up phase, its exact data processing procedures cannot be described yet. However, this document outlines the expected principles that Ocutune plans to follow for data protection.

2. Current Status

- 2.1 Ocutune's sensors only collect information on the light environment through Light Spectrum, providing a landscape of light on a room basis. This data cannot be linked to individuals using the room, and therefore, it is not considered personal data.
- 2.2 Ocutune does process personal data in the form of user login information, which is stored for as long as the user is authorized to use the service.
- 2.3 Customers can potentially collect the room-level light data provided by Ocutune and correlate it with information on which persons are using the rooms. However, such a process would require significant effort, and it would be hard to identify any one specific person from the data. It is worth noting that Ocutune does not intend for customers to make such correlations.

3. Future Plans

- 3.1 Ocutune will eventually become more personalized, allowing for individual recommendations on light needs for each user.
- 3.2 When this happens, the user profiles and their light consumption data will be considered personal data under the GDPR.



3.3 Ocutune will comply with relevant legislation, including the GDPR's principles of processing, and will adhere to the following overall principles for processing personal data:

- Ocutune will be the data controller for such personal data.
- Data collection and processing to create a personal profile and provide recommendations will require explicit consent from the user.
- All personal data processing will be subject to appropriate security measures.
- Personal data will only be stored for a reasonable period, up to one year, and used for the purpose of creating profiles and providing individual recommendations.
- Any other use of personal data collected on light consumption will be anonymized, making it impossible to identify a user