



Privacy Policy, GDPR Compliance & Data Processing Addendum (DPA) MobileApp(s): MobileScanIM

1. Introduction

UMA ("we", "our") provide enterprise mobile applications for operational and healthcare environments. This document defines privacy practices, GDPR compliance, and data processing responsibilities.

2. Roles (GDPR Art. 4, 28)

We act as a Data Processor. The Customer is the Data Controller and determines purpose and means of processing.

3. Legal Basis (GDPR Art. 6)

Processing is based on contractual necessity, legitimate interests, and legal obligations. Consent is used where required.

4. Data Collected

Personal data (name, user ID), device data (device ID, OS), operational logs, and healthcare-related identifiers where applicable.

5. Security Measures (GDPR Art. 32)

- TLS/SSL encryption - Role-based access - API token authentication - Audit logging - Infrastructure-level encryption

6. Data Processing Addendum (DPA)

We process data only under instruction, ensure confidentiality, and require subprocessors to meet equivalent safeguards.

7. Subprocessors

Cloud providers and infrastructure vendors are used under contractual agreements with data protection obligations.

8. International Transfers (GDPR Chapter V)

Transfers outside EEA use Standard Contractual Clauses (SCCs) or equivalent safeguards.

9. Data Subject Rights

Access, rectification, erasure, restriction, portability, and objection rights are supported via the Data Controller.

10. Mobile & API Data Handling

Device identifiers, tokens, and API interactions are logged securely. Tokens are time-limited and protected.

11. HIPAA Considerations

When applicable, systems support HIPAA compliance with administrative, technical, and physical safeguards.

12. Retention

Data is retained only as necessary for operations, compliance, and audit requirements.

13. Breach Notification (GDPR Art. 33)

In the event of a breach, notification will occur without undue delay per regulatory requirements.

14. Compliance (Apple / Google)

No sale of personal data. Data collection minimized. Transparent usage and secure handling enforced.

15. Contact

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