

# Privacy Policy – Reducept Painfree App

Version: September 2025

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## 1. Who we are

### **Reducept B.V.**

Chamber of Commerce (KvK): 74239678

Email: [info@reducept.com](mailto:info@reducept.com)

Reducept is responsible for the processing of personal data as described in this privacy policy.

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## 2. What data do we process?

When you use the Reducept Painfree App, we process the following data:

**Account information:** name, email address, password, subscription details.

**Payment information:** depending on your chosen payment method via Apple, Google, or directly through Reducept (e.g. iDEAL, credit card).

**Usage data:** progress within the App, session duration, exercises completed.

**Technical data:** device type, operating system, IP address.

**Health-related data:** only if voluntarily entered by the user (e.g. pain scores or diary notes).

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## 3. Purposes of data processing

We process your data for the following purposes:

- To provide access to and enable use of the App.
- To process payments and manage subscriptions.
- To improve the App and user experience (statistics, analytics).
- To provide customer service and support.
- To comply with legal obligations.

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## 4. Legal basis for processing

We process personal data on the following legal grounds:

- **Performance of a contract** (use of the App).
- **User consent** (for entering health-related information).
- **Legal obligation** (e.g. tax record-keeping).
- **Legitimate interest** (such as App security and improvement).

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## 5. Sharing data with third parties

- **Apple and Google:** for payments made via the App Store or Google Play Store, payment data is processed by Apple/Google.
- **Payment service providers:** for direct payments via the Reducept website.
- **IT service providers:** for hosting, maintenance, and technical support of the App.
- **Legal authorities:** only when required by law or regulation.

Reducept **never sells your personal data** to third parties.

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## 6. Retention period

- **Account information:** retained for as long as you have an account, and deleted no later than 12 months after termination.
- **Payment data:** retained for 7 years in accordance with tax law.
- **Health data:** retained for a maximum of 12 months after account termination, unless you request earlier deletion.

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## 7. Security

Reducept takes the protection of your personal data very seriously and implements appropriate technical and organizational measures to prevent misuse, loss, unauthorized access, unwanted disclosure, or unauthorized alteration.

Reducept follows internationally recognized information security standards:

- Reducept is **ISO 27001 certified** (information security).
- Reducept also complies with **NEN 7510**, the Dutch standard for information security in healthcare.

Examples of security measures include:

- Encrypted storage and transmission of data,
- Restricted access to systems and data (authorized personnel only),
- Logging and monitoring of usage,
- Regular penetration tests and security audits,
- Staff training on privacy and information security.

If you believe your data is not properly secured or suspect misuse, please contact us immediately at [info@reducept.com](mailto:info@reducept.com).

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## 8. Your rights

You have the right to:

- Access your personal data,
- Request correction or deletion,
- Request restriction of processing,
- Withdraw consent,
- Request data portability,
- File a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens).

Requests can be submitted via [info@reducept.com](mailto:info@reducept.com).

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## **9. Minors**

The App is intended for adult users. If you are under 16 years of age, parental or guardian consent is required.

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## **10. Changes**

Reducept may amend this privacy policy. The most recent version is always available at [www.painfree.app](http://www.painfree.app), [www.reducept.com](http://www.reducept.com), or within the App.