

Privacy Policy – Grabi

1. Introduction

Grabi is a patient-facing mobile application developed and managed by L V Prasad Eye Institute (LVPEI), a not-for-profit healthcare organization.

This Privacy Policy explains how we collect, use, store and protect your personal information when you use the Grabi app, in compliance with India's Digital Personal Data Protection Act, 2023 (DPDPA).

We are committed to protecting your privacy and maintaining the confidentiality of your personal and medical information.

2. What We Collect

When you use Grabi, we may collect:

- **Personal Information:** Name, age, gender, phone number, email, address, pincode.
- **Health Information:** Eye-related symptoms, interpreting results, medical history, prescriptions, uploaded images (if you share them).
- **Device Information:** IP address, device identifiers, app usage analytics (to improve functionality).
- **Consent and Communication Records:** Your preferences, consents, and communications with LVPEI.

3. Purpose of Processing

Your personal and image data is used solely for:

- Screening, clinical assessment, or research (as applicable).
- Allowing authorized LVPEI clinicians to review uploaded images.
- Contact you for follow-up, feedback, or reporting results.
- Improving Grabi's functionality and user experience.
- Compliance with medical records and data protection obligations.

4. Image Handling and Storage

- **Original Images:** Stored in full resolution to preserve diagnostic quality.
- **Compression:** Only used within the Grabi Portal to generate low-resolution previews for faster loading.
- **Access:** Restricted to authorized LVPEI personnel with secure credentials.
- **Retention:** Retained only as long as needed for the purposes outlined above, after which they are securely deleted or anonymized.

Images may contain features that could serve as biometric identifiers. LVPEI treats them as sensitive to personal data and protects them accordingly. If authentication methods are changed, appropriate consent will be sought.

5. Legal Basis and Consent

Your personal and health data are processed based on:

- Your explicit consent provided when you register or use Grabi.
- Legal obligations under healthcare and data protection laws.
- Vital interest in providing medical care and ensuring patient safety.

You can withdraw your consent at any time by contacting us, but this may affect your ability to use certain services.

6. Data Retention

LVPEI retains personal and health data only as long as necessary for:

- Providing services and maintaining screening records;
- Fulfilling legal or regulatory obligations; or
- Research and analytics in anonymized form.

When retention is no longer required, data is securely deleted or anonymized.

7. Data Sharing

Your data may be shared only with:

- Authorized LVPEI clinicians and staff for diagnostic or screening purposes.
- Technology service providers support the app's secure operation (under strict confidentiality agreements).
- Government or regulatory authorities, when legally required.

We do not transfer your personal or image data to any external third parties for commercial purposes.

8. Data Security

We employ technical and organizational safeguards to protect your data including but not limited to:

- Encryption of data.
- Multi-factor authentication for users.
- Role-based access control for clinicians and authorized personnel.
- Audit trails for all image and data access on the Grabi Portal.
- Regular data protection audits and vulnerability assessments.

In case of a data breach, LVPEI will promptly follow the protocol and procedure as prescribed by the law in force in India and the time of such an act.

9. Your Rights

As per DPDPA, you have the right to:

1. Access your personal and health data.
2. Request correction or update of inaccurate data.
3. Request deletion of your data (unless retention is required by law).
4. Withdraw consent for processing.
5. Nominate another person to exercise your rights if you are unable to do so.
6. Lodge a grievance or complaint about data handling.

To exercise these rights, please contact us (details below).

10. Children's Data

Grabi is intended for individuals aged 18 and above. If a minor uses the app, verifiable parental or guardian consent is required before personal or health data can be processed.

11. Cross-Border Data Transfers

All patient data is stored on servers located in India. If processing outside India becomes necessary, equivalent legal protections will be ensured in compliance with DPDPA.

12. Contact

Data Protection Officer (DPO)

L V Prasad Eye Institute (LVPEI)

L V Prasad Marg, Banjara Hills, Hyderabad – 500034, India

Email: communications@lvpei.org

Phone: +91-40-3061 2345