

# Privacy Policy

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**Effective Date: 4 December 2025**

Operator: VIRTUALITY P.C. / VIRTUALITY I.K.E. | Address: EYMAΘIOY 76B, 71409 HPAKΛEIO, Greece

## 1. About this Privacy Policy

This Privacy Policy explains how VIRTUALITY P.C. / VIRTUALITY I.K.E. ("VIRTUALITY", "we", "us" or "our") collects, uses, stores, shares and protects personal data in connection with virtuality.app, our website, SaaS dashboard, VR rehabilitation software, VR equipment pilots, support services and related communications (together, the "Service").

VIRTUALITY provides virtual reality physiotherapy tools to physiotherapists and physiotherapy businesses to help accelerate and optimise physical rehabilitation. The Service is intended for professional business use by physiotherapists and authorised representatives of physiotherapy businesses, not for direct consumer or child use.

For account, billing, website, marketing, support and business relationship data, VIRTUALITY acts as the data controller. For patient data entered into the platform by physiotherapists, clinics or physiotherapy businesses, the relevant physiotherapist, clinic or business is the data controller and VIRTUALITY acts as a data processor/service provider that processes such data on their instructions, unless we expressly state otherwise or use aggregated/de-identified data for our own lawful purposes.

## 2. Contact details

Controller/operator: VIRTUALITY P.C. / VIRTUALITY I.K.E..

Registered address: EYMAΘIOY 76B, 71409 HPAKΛEIO, Greece.

General and privacy contact: info@virtuality.app. Support contact: support@virtuality.app.

VIRTUALITY has not appointed a Data Protection Officer at the effective date of this Policy. Privacy requests should be sent to the contact details above.

## 3. Who this Policy covers

- Physiotherapists, clinic owners, employees, contractors and other authorised business users who create or use an account.
- Patients whose information is entered into the Service by a physiotherapist or clinic.
- Website visitors, waitlist applicants, pilot participants and people who contact us for support, demos or sales.
- Business contacts, suppliers and partners.

## 4. Personal data we collect

### 4.1 Account and profile data

When a professional user creates or uses an account, we may collect name, email address, username, password credentials or password hash, Google OAuth identifiers if Google sign-in is used, phone number, business or clinic information, address, role, preferences, avatars/profile images and account settings.

### 4.2 Subscription, billing and equipment data

For subscriptions, pilots, invoices, free trials and VR equipment logistics, we may collect plan type, billing history, invoice details, VAT/tax information, bank transfer status, delivery address, courier information, equipment identifiers, equipment return status, damage/repair records and related communications. If Stripe or another

payment processor is implemented in the future, payment details may be processed by that provider; we do not currently store card details ourselves.

### 4.3 Patient and rehabilitation data

Physiotherapists may choose to enter patient data into the Service. Depending on what the physiotherapist enters, this may include patient name, optional phone number, rehabilitation notes, health and medical history, treatment goals, exercise assignments, VR exercise activity, body-motion data, performance metrics, progress information, images, videos, text notes and other content relating to physiotherapy treatment. This may include health data and therefore special category personal data under the GDPR.

### 4.4 Technical, device and usage data

We may collect IP address, browser type, operating system, device identifiers, VR device data, crash logs, security logs and other information necessary to operate, secure and maintain the Service. Where optional analytics, heatmaps, session recordings or similar usage-measurement tools are enabled, they will be used only where permitted by law and subject to consent controls where required.

### 4.5 Cookies and similar technologies

At the effective date of this Policy, we use cookies, local storage and similar technologies only where they are strictly necessary to operate the website, dashboard, login sessions, security, equipment/software functionality and user-requested preferences. We do not currently use non-essential analytics, marketing or advertising cookies or similar tracking technologies. If we introduce additional analytics, marketing, advertising or optional preference cookies or comparable technologies in the future, we will provide a cookie banner or consent management tool with user controls where required by law.

### 4.6 Communications

If you contact us or participate in a demo, pilot, support call, webinar or video call, we may process the content of your messages and may record calls where appropriate notice or consent is provided.

## 5. How and why we use personal data

Purpose	Examples	Main GDPR basis
Provide and administer the Service	Create accounts, authenticate users, provide the dashboard, VR software, exercise tools and support.	Contract; legitimate interests; for patient data, processing on the customer's instructions.
Manage subscriptions and equipment	Issue invoices, manage monthly/yearly plans, free trials, bank deposits, future Stripe payments, VAT-inclusive pricing, deliveries, returns and repairs.	Contract; legal obligation; legitimate interests.
Patient rehabilitation workflows	Enable physiotherapists to document rehabilitation, assign exercises, monitor progress and use VR tools with patients.	For patient data, customer/physiotherapist legal basis and Article 9 condition; VIRTUALITY generally acts as processor.
Support and communications	Respond to support requests, operational notices, update emails, demos, pilots and customer service.	Contract; legitimate interests; consent where required.
Analytics and product improvement	Understand feature usage, improve performance, debug issues, develop safer and better rehabilitation tools, and produce aggregated/de-identified insights.	Legitimate interests; consent for non-essential cookies/trackers where required.
Security and fraud prevention	Protect accounts, systems, VR devices and data; detect misuse and policy violations.	Legitimate interests; legal obligation.
Marketing	Send newsletters, product updates, offers, promotions, testimonials, case studies or other promotional communications.	Consent where required; legitimate interests for limited B2B communications where permitted.
Legal compliance	Comply with tax, accounting, regulatory, court, authority, contract and legal claim obligations.	Legal obligation; legitimate interests.

## 6. Health data and other special category data

Patient health and rehabilitation information may be special category personal data. VIRTUALITY does not require physiotherapists to enter more patient data than is necessary for use of the Service. The physiotherapist or physiotherapy business is responsible for ensuring that it has a valid legal basis and, where required, an Article 9 GDPR condition such as explicit consent or another healthcare-related legal basis before entering patient data into the Service.

Body-motion and rehabilitation performance data is used to provide the Service and improve rehabilitation functionality. Unless expressly stated otherwise, we do not use body-motion data to uniquely identify a person as biometric identification data.

We are not intended for direct use by patients without supervision of a qualified physiotherapist. Patients should normally address requests about their treatment records to their physiotherapist or clinic first, although they may also contact us using the details above.

## 7. AI and model training

At the effective date of this Policy, VIRTUALITY does not provide an AI input/output feature inside the Service and does not use patient data for AI training. We may use AI tools internally for software development, drafting, testing or operational assistance, without intentionally submitting identifiable patient health data to such tools.

If we later introduce AI functionality or use identifiable personal data, including patient data, for AI training or similar model-improvement purposes, we will update this Policy and implement an appropriate legal basis, transparency, safeguards and consent or opt-out mechanism where required by law. We may use aggregated, statistical or de-identified exercise and performance data to improve the Service where such data no longer identifies individuals or where the processing is otherwise lawful.

## 8. Cookies and consent

Strictly necessary cookies and local storage are used to operate the website, dashboard, login sessions, security, core Service functionality and user-requested preferences. Because we currently use only strictly necessary cookies and similar technologies, we do not currently request consent for non-essential cookies. If we add optional analytics, marketing, advertising or similar tracking technologies in the future, we will provide clear notice and a cookie banner or consent management tool that allows users to accept, reject or manage those optional technologies where required by law.

You may manage strictly necessary cookies through your browser settings, although disabling them may affect login, security or core Service functionality. If we make optional cookies or similar technologies available in the future, you will be able to manage them through the consent tool or controls we provide, where required by law. If our available controls do not allow you to make a specific privacy choice, you may contact us at [info@virtuality.app](mailto:info@virtuality.app).

## 9. How we share personal data

We do not sell personal data. We may share personal data with the following categories of recipients where necessary for the purposes described in this Policy:

- Hosting, infrastructure, database and security providers, including Vercel, Cloudflare, AWS and Neon DB.
- Authentication, communication and productivity providers, including Google services such as Google OAuth, Gmail and Google Meet.
- Analytics and monitoring providers, such as Google Analytics, PostHog and Grafana-related services, where enabled and where permitted by law. Optional analytics or tracking technologies will be subject to consent controls where required.
- Payment, invoicing and banking providers, including bank transfer infrastructure now and Stripe or similar payment providers in the future.

- Couriers, equipment repair providers and logistics partners for VR headset delivery, return, replacement and repair.
- Professional advisers, insurers, auditors, accountants and legal counsel.
- Public authorities, courts, regulators or other third parties where required by law, to protect rights, or in connection with a business transaction.

Service providers are expected to process personal data only for authorised purposes and subject to confidentiality and security obligations. Where required, we seek to use appropriate data processing agreements with processors and subprocessors.

## 10. International transfers

VIRTUALITY is established in Greece and currently focuses on Greece and Cyprus. However, some technology providers may process personal data in the EU/EEA and in other countries where they or their subprocessors operate. Where personal data is transferred outside the EU/EEA, we rely on appropriate safeguards such as adequacy decisions, Standard Contractual Clauses, contractual protections and supplementary measures where required.

## 11. Data retention

We keep personal data only for as long as necessary for the purposes described in this Policy, unless a longer period is required or permitted by law. The following retention periods are used as a practical baseline and may be adjusted where necessary for legal, tax, accounting, security, backup, dispute, fraud-prevention or compliance reasons:

Data category	Retention approach
Account data	For the account lifetime and normally deleted or anonymised within 30 days after account deletion, except where retention is required.
Patient data and user content	For as long as the customer account is active or as instructed by the customer, unless deletion is requested or legal reasons require retention.
Billing, invoices and tax records	For the period required by applicable tax, accounting and commercial laws.
Analytics, logs and security records	For a limited period appropriate to analytics, troubleshooting and security purposes, or longer where needed to investigate misuse or comply with law.
Support and business communications	For as long as needed to manage the relationship, resolve issues and protect legal rights.
Backups	Deleted data may remain in encrypted or restricted backups for a limited backup cycle before being overwritten, unless restoration is required for security or legal reasons.

## 12. Your rights

Subject to applicable law and the limits that apply to processor/customer-controlled patient data, you may have the right to request access, rectification, erasure, restriction, portability, objection to processing, withdrawal of consent and review or appeal of a decision relating to a privacy request. You may also have the right to lodge a complaint with the Hellenic Data Protection Authority, the Cyprus Commissioner for Personal Data Protection, or another competent supervisory authority.

To make a request, contact [info@virtuality.app](mailto:info@virtuality.app). We aim to acknowledge privacy requests within 48 hours and will respond within the time required by applicable law. We may verify your identity through your account email or other reasonable steps. Patients may be directed to their physiotherapist or clinic where the clinic is the controller of the relevant patient data.

### **13. Security**

We use technical and organisational measures designed to protect personal data, including access controls, authentication controls, secure hosting practices, restricted administrative access, confidentiality obligations, backups and monitoring. No online service can guarantee absolute security. Users must keep account credentials confidential and notify us promptly of suspected unauthorised access.

If we become aware of a personal data breach, we will assess it and notify competent authorities and affected individuals where required by applicable law.

### **14. Children**

The Service is intended for professional users aged 18 or over. It is not directed to children and we do not knowingly collect personal data directly from children. If we discover that a child has created an account or that personal data was collected contrary to this Policy, we will suspend the account and delete the relevant data where legally appropriate.

### **15. Marketing, testimonials and communications**

We may send product updates, service notices, newsletters and promotional communications where permitted by law. You may unsubscribe from marketing communications when an unsubscribe method is provided or by contacting us. Service, security, billing and operational messages may still be sent where necessary.

We may use customer names, logos, testimonials, reviews and case studies for marketing where permitted by the applicable agreement, consent or other lawful basis. Customers may contact us to object to such use where applicable.

### **16. Changes to this Policy**

We may update this Privacy Policy from time to time. Material changes will be communicated through the website, dashboard, email or other reasonable means where appropriate. The updated version will apply from the date stated at the top unless otherwise specified.

### **17. Contact**

Questions, privacy requests and support requests may be sent to [info@virtuality.app](mailto:info@virtuality.app) or [support@virtuality.app](mailto:support@virtuality.app). Postal correspondence may be sent to ΕΥΜΑΘΙΟΥ 76Β, 71409 ΗΡΑΚΛΕΙΟ, Greece.