

**Datacubed Health**  
**Umgaqo-nkqubo wokuFahlwa**  
**Umhla wokuQalisa ukuSebenza: 1 Epreli 2025**

**Intshayelelo**

Ukufahlwa kwakho kubalulekile kuthi e-Datacubed Health. Lo Mgaqo-nkqubo wokuFahlwa (uMgaqo-nkqubo) ucacisa indlela esinokuqokelela, sisebenzise, kwaye sabelane ngayo ngeenkukacha zakho. Usebenza kwiwebhusayithi yethu, kwiinkonzo, kwiinkukacha, kwizixhobo, ukusebenzeni, ekuhlaziwenni, kunye nakwizinto ezifana nezi (ngokudibeneyo linkonzo). Unamalungelo amaninzi ngokubhekisele kwiinkukacha zakho. Nceda ufunde lo Mgaqo-nkqubo ngononophelo ukuze uqonde lento siyenzayo kunye namalungelo wakho.

**Imigaqo Ebandakanyiwego**

Le migao ilandelayo yongeziwego ibandakanywe kulo Mgaqo-nkqubo, ichazwe ngokupheleleyo apha:

- Imigaqo yoMsebenzisi weeNkonzo
- Umgaqo-nkqubo wokuFahlwa kwaBantwana
- Umgaqo-nkqubo we-Cookie

**Singoobani**

Siyi-Data Cubed, LLC d/b/a Datacubed Health. Kunokufikelewa kuthi apha [legal@datacubed.com](mailto:legal@datacubed.com) kunye naku:

Datacubed Health  
630 Freedom Business Center  
3<sup>rd</sup> Floor  
King of Prussia, PA 19406

I-Datacubed Health yinkampani yetekhnoloji eyenza isayensi engcono kunye noluntu olusempilweni lube yimpumelelo. Sisebenzisa izisombululo ezigxile kumntu ngamnye zokuthathwa kwedatha, kuquka ii-apps ze-smartphone, ezinto ezinxitywayo, zasekhaya, kunye neesensa zokusingqongileyo, kunxibelewano olenziwa ukude nezigulane kunye nezfundo zaseklinikhi ezenziwa nge-intanethi. Ngokunxulumene nophando, ulingo, iiinkqubo zophononongo, amaphulo othethathethwano nesigulane, okanye iiprojekthi esiziqhubayo egameni leenkampani kunye nemibutho yokunyamekela impilo (“Izifundo zoPhando IwaMayeza”) kunye namaziko emfundo (“Uphononongo IwezeMfundu”) (ngokudibeneyo “linkqubo Zophononngo”), ngamanye amaxesha siqokelela iinkukacha ezivela kuwe.

Xa ubona igama elithi “si,” neliti “yethu” yazi ukuba kuthethwa ngeDatacubed Health. Xa kuthethwa “ngeqela lesithathu” kuthethwa ngomntu ongenguwé okanye ongesithi.

SingabaSebenzisi beenkukacha zoluqu esizinikwa ngaBathathi-nxaxheba beKlayenti.  
SingabaLawuli beenkukacha zoluqu esizinikwa ngaBathathi-nxaxheba be-Datacubed Health.

## Ungubani

Kulo Mgaqo-nkqubo, u-“wena” uthetha wena njenge:

- Klayenti - umqeshwa okanye ummeli weshishini elisebenzisa i-Datacubed Health
- Umthathi-nxaxheba weKlayenti - umntu ocelwe lishishini othathi-nxaxheba kophononongo olwenziwa yi-Datacubed Health egameni leshishini elo
- Umthathi-nxaxheba we-Datacubed Health - umntu othathi-nxaxheba kophononongo olwenziwa yi-Datacubed Health egameni layo

Wena njengeKlayenti unguMlawuli weenkukacha zoluqu zoMthathi-nxaxheba weKlayenti osinika zona.

## Sesiphi isiseko esisemthethweni esinaso sokucubungula iinkukacha zoluqu

Sicubungula iinkukacha zakho ngokusekwe kwi:

- Mvume osinika yona okanye oyinika iKlayenti yethu ngokunxulumene neziFundo esiziqhubayo. Unelungelo lokuyirhoxisa imvume yakho nangaliphi na ixesha. Unokurhoxisa imvume yakho yokuba sicubungule iinkukacha zakho ngokuqhagamshelana nathi ku-[legal@datacubed.com](mailto:legal@datacubed.com) okanye ngokuqhagamshelana neKlayenti yethu, umxhasi weSifundo, ngokusebenzisa isayithi yeklinikhi apha uphando luqhutyelwa khona. Ucubungulo oluqhutywa ngokunxulumene neZifundo oluphantsi kwestiseko esisemthethweni “seMvume” lolu:
  - Ukuqokelelwa kweenkukacha zoluqu kuBathathi-nxaxheba beKlayenti kunye nakubathathi-nxaxheba be-Datacubed Health, kunye
  - Ukuqokelelwa kunye nokusetyenziswa kweenkukacha zoluqu ukuze kunikeye ngeeNkonzo.
- Ukuya kuthi ga kwinqanaba elingenakudlula ngaphaya kwamalungelo akho aphantsi komthetho osebenzayo, kuMdla wethu woShishino oluseMthethweni. Ucubungulo oluqhutywa phantsi kwezizathu ezisemthethweni “zoMdla woShishino oluseMthethweni” kuku:
  - Phendula kwiinkonzo kunye nakwimiba yenqxaso yetheknoloji kunye nezicelo,
  - Fezeki izicelo zakho ozenzileyo kwiwebhusayithi yethu kunye nakwigumbi loncedo okanye ezithunyelwe ku-[legal@datacubed.com](mailto:legal@datacubed.com)
  - Velisa kunye nokuphucula iiNkonzo

## Zeziphi iinkukacha zoluqu esiziqokelelalo

NjengoMthathi-nxaxheba weKlayenti okanye uMthathi-nxaxheba we-Datacubed Health kuPhononongo IwezeMfundu, sinokuqokelela ezi nkukacha zilandelayo xa ubhalisela ukuthathi-nxaxheba, kwaye uthathi-nxaxheba, kuPhononongo IwezeMfundu:

- Igama
- Idilesi
- Umhla wokuzalwa
- Indawo ozalelwwe kuyo
- Idilesi ye-imeyile
- Igama lomsebenzisi
- linkcukacha ezivela kwimisebenzi yakho kunye nakwizixhobo ezisetyenziswa kwiiNkonzo
- Indawo oyisebenzisayo eneempawu ze-Geofencing, njengoko kufanelekile
- linkcukacha zefowuni
- linkcukacha ze-Bluetooth
- Amagama wabantu abasefowunini
- I-metadata yeseli
- I-metadata yomyalezo we-SMS
- Idilesi ze-IP
- I-metadata yamakhasi onxibelelwano
- linkcukacha zobuqu (ubuhlanga, isini, ubude, kunye nobunzima bomzimba)
- Imeko yezonyango
- Ithamo lechiza kunye/okanye iinkcukacha zokutshintsha kwethamo
- Indawo ekutofwe kuyo ichiza kunye neenkukacha zomhla wokutofwa
- Idatha yeenkukacha zophando IwezeMpilo, ezoQoqosho kunye neZiphumo zoPhando (HEOR).

NjengoMthathi-nxaxheba weKlayenti okanye uMthathi-nxaxheba we-Datacubed Health kuPhononongo loPhando IwezoNyango, sinokuqokelela ezi nkukacha zilandelayo xa ubhalisela ukuthathi-nxaxheba, kwaye uthathi-nxaxheba, kuPhononongo loPhando IwezoNyango:

- Igama, kunye nefani ukuba uyafuna
- Idilesi ye-imeyile
- linkcukacha ezivela kwimisebenzi yakho kunye nakwizixhobo ezisetyenziswa kwiiNkonzo
- Indawo oyisebenzisayo eneempawu ze-Geofencing, njengoko kufanelekile
- Idilesi ze-IP
- Imeko yezonyango
- Ithamo lechiza kunye/okanye iinkcukacha zokutshintsha kwethamo
- Indawo ekutofwe kuyo ichiza kunye neenkukacha zomhla wokutofwa
- Idatha yeenkukacha zophando IwezeMpilo, ezoQoqosho kunye neZiphumo zoPhando (HEOR).

NjengeKlayenti, sinokuqokelela ezi nkukacha zilandelayo:

- Igama
- Idilesi yeshishini
- Inombolo yefowuni yeshishini

- Idilesi ye-imeyile yeshishini
- Nawuphi na umyalezo osithumelela wona
- Iinkcukacha zokuhlawuliswa
- Ezinye iinkcukacha eziyimfuneko ukuze sinikeze ngeenkonzo zethu kuwe

NjengeKlayenti, unguMlawuli wezi nkukacha, kwaye singabaCubunguli bezi nkukacha.

## **Indlela esinokuzisebenzisa ngayo iinkcukacha zoluqu**

Sisebenzisa iinkcukacha esiziqokelela kuwe njengoMthathi-nxaxheba weKlayenti okanye uMthathi-nxaxheba we-Datacubed Health ukunikeza ngeeNkonzo kuwe. Sinokusebenzisa ezi nkukacha ukusinceda sivelise kwaye siphucule iiNkonzo zethu, sifezekise izicelo zakho, kunye nezinye iinjongo ezivunyelwe ngumthetho.

Ukuba unguMthathi-nxaxheba weKlayenti, ucubungulo lwethu lweenkukacha zakho kunyinwe koko kuvunyelwene ngako kwisivumelwano neKlayenti. Sabelana kuphela ngedatha engenakuchongwa ukuba yekabani neKlayenti, nomxhasi woPhononongo.

Sisebenzisa iinkcukacha esiziqokelela kwiiKlayenti ukuphendula imibuzo yakho kunye nokunika wena iiNkonzo.

## **Sinokwabelana njani ngeenkukacha zoluqu**

Sabelana ngeenkukacha zoluqu nababoneleli bethu beenkonzo ngokuyimfhlo ukuze bakwazi ukunikeza ngeenkonzo kuthi, kuwe, kwaye basenze sikwazi ukunikeza ngeeNkonzo:

- I-Amazon Web Services, Inc. (AWS) ibonelela ngeeseva eMelika (U.S.) kunye nase-Germany ezigcina zonke iinkcukacha zoluqu eziqokelelwne kuwe.
- I-Rocket Science Group LLC d/b/a Mailchimp, ese-U.S., isinceda silawule unxibelewano olwenziwa ngee-imeyile.
- Iqela le-Stefanini, elise-U.S., e-Belgium, e-Romania, e-China, e-Poland, kunye nase-Philippines, lisinceda ukulawula amatikiti enkxaso
- I-Twilio, Inc., ese-Germany kunye nase-U.S., isinceda sithumele kwaye sifumane imiyalezo ebhaliwego kwaye ibonelela ngeenkomfa ezenziwa ngevidiyo.
- I-Splunk, Inc., ese-Germany nase-U.S., kunye ne-Sisense, Ltd., ese-Germany kunye nase-U.S., isinceda sihlalutye kwaye sinikeze ngeengxelo zokusebenza ezimalunga neenkukacha zoluqu

Ngokomyalelo weeKlayenti zethu, sabelana ngeenkukacha zoluqu nezibhedlele kunye neekliniki ezbonelela ngeenkonzo egameni leeKlayenti zethu.

Sinokwabelana ngeenkukacha zoluqu norhulumente kunye/okanye ii-archente zogcino-mthetho kangangoko sikholelwa ukuba kuyimfuneko ukuthobela umthetho, njengokuphendula iisamani okanye umyalelo wenkundla yamatyla, ukukhusela ibango elisemthethweni okanye

ukumisela okanye ukukhusela amalungelo ethu asemthethweni okanye ngenye indlela njengoko kuvunyelwa ngumthetho osebenzayo. Sizibophelele ekuhlalutyeni ukuba semthethweni kwayo nayiphi na isamani okanye umyalelo wenkundla yamatyla wokuveza idatha, ukuphikisana nesamani okanye nomyalelo wenkundla yamatyla, emva kohlolo olwenziwe ngononophelo, ukuba sigqiba ekubeni kukho izizathu zokwenza oko, ukufuna amanyathelo exeshana wokumisa iziphumo zesamani okanye zomyalelo wenkundla yamatyla de inkundla igqibe malunga nokufaneleka kokungavezi idatha yobuqu eceliweyo de ukwenza njalo kudingke phantsi kwemithetho esebenzayo, kwaye kubonelelwe ngeenkukacha ezincinane ezivumelekileyo xa kuphendulwa isamani okanye umyalelo wenkundla, ngokusekelwe kwingcaciso efanelekileyo yesamani okanye yomyalelo wenkundla. linkcukacha ekwabelwana ngazo zixhomekeke kwinto efunwayo kwiisamani okanye kumyalelo wenkundla.

Sinokuchaza iinkcukacha zoluqu esinazo kwimeko esikholelwa ukuba iyimfuneko okanye ifanelekile ukuthintela izenzo zolwaphulo-mthetho, ukwenzakala, ukonakaliswa kwempahla okanye ukwenzakala emzimbeni. linkcukacha zoluqu ezivezwayo zixhomekeka kwezo meko.

Sinokudlulisela iinkcukacha zakho kumntu ozakulandela onomda, nto leyo enokubandakanya kodwa ingaphelelanga kumntu wesithathu xa sithe samfumana, sathengiswa, kwathengiswa ii-asethi, sadityaniswa nabanye, okanye saphelelwa yimali. Imigaqo-nkqubo esebenza kwiinkcukacha zakho emva koko inokumiselwa ngulowo kugqithiselwa kuye, ngaphandle kokuba oko akuvunyelwa ngumthetho. linkcukacha zoluqu zalowo kugqithiselwa kuye ziya kubandakanya iinkcukacha zoluqu eziqokelelwe ngendlela ekuchazwe ngayo ngasentla.

Nawuphi na umntu wesithathu esabelana naye ngenkcukacha zakho uya kubonelela ngokhuseleko olufanayo okanye olulinganayo lweenkcukacha zakho njengoko kuchaziwe kuMgaqo-nkqubo kwaye nanjengoko kufunwa ziZikhokelo ze-Apple App.

## **Siyigcina kwaye siyicobungule phi idatha yobuqu**

Sigcina iinkcukacha esiziqokelela kuwe kwiiseva esizinkwa yi-AWS yase-U.S. kunye nakwi-European Union (EU). Ngeenjongo zokuvavanya, iinkcukacha esiziqokelela kuwe zisenokugcinwa kwiikhompyutha ezisetyenziswa ngabasebenzi bethu e-U.S. linkcukacha esiziqokelela kuwe kwi-European Economic Area (EEA), e-United Kingdom (UK), kunye nase-Switzerland zinokuthunyelwa kwaye zigcinwe ngaphandle e-EEA, e-UK, kunye nase-Switzerland ngenxa yokuba imisebenzi yethu kunye nezinye iiseva zethu zibekwe e-U.S. Singena kwiKhontrakthi enamaGatya aMiselweyo ukuze sidlulise iinkcukacha zakho ngaphandle kwi-EEA, e-UK, kunye nase-Switzerland. Siye sarhoa kwi-EU-U.S. Privacy Shield Framework kunye nakwi-Swiss-U.S. Privacy Shield Framework njengoko imiselwe liSebe lezoRhwebo laseMelika malunga nokuqokelela, ukusetyenziswa kunye nokugcinwa kweenkcukacha zoluqu eziidlulisiweyo ukusuka kwi-EEA nase-Switzerland zisiya e-U.S.; siya kuqhubeaka nokusebenzia i-Privacy Shield Principles kwiinkcukacha zoluqu esizifumene ngelixa sithathi-nxaxheba kwi-Privacy Shield Frameworks. Ukufunda ngakumbi ngenqubo ye-Privacy Shield, ndwendwela ku-<https://www.privacyshield.gov/>.

## **Singayigcina ixesha elingakanani idatha yakho yobuqu**

Sinokugcina iinkcukacha zakho ixesha elide kangangoko kufuneka ngokomthetho. Ukuba akukho mfuno yomthetho iphikisayo, siya kuyigcina ixesha elide kangangoko sifuna ukuqhuba iINkonzo. Sisenokugcina iinkcukacha zakho kangangexesha elithile elifanelekileyo. Umzekelo, apha umthetho wase-US usebenza, kwaye apha umthetho wase-US ufunwa, sigcina iinkcukacha zezempiro ezikhuselwego kangangeminyaka esi-7.5 okanye njengoko kufunwa okanye kuvunyelwa ngumthetho, kwaye apha iNkomfa yaMazwe ngaMazwe emalunga ne-Harmonization Guidelines for Industry Structure and Content of Clinical Research Study zisebenza, idatha yoPhononongo loPhando IwezoNyango igcinwa isithuba seminyaka engama-25 xa kugqitywe ukunikezwa ngeeNkonzo okanye ixesha elide njengoko kufunwa ngumthetho wenginqi.

## **Ungasifumana kwawaphi amakhasi onxibelewano kunye ne-Cookies**

Ungasifumana ku-Facebook, ku-Twitter, kunye naku-LinkedIn. Xa undwendwela amakhasi wethu onxibelewano, unokutshintsha umseto wee-cookies ezingabalulekanga ukuze unikeze ngeenkonzo ozicelayo. I-cookie yifayile encinci ebekwe kwisixhobo sakho eyenza iimpawu kunye nokusebenza kwewebhusayithi ye-[www.datacubed.com](http://www.datacubed.com). Umgaqo-nkqubo we-Datacubed Health Cookie uchaza ukuba yintoni i-cookies, ukusetyenziswa kwe-cookies zethu, kunye nendlela onokuzilawula ngayo ii-cookies. Ngaphandle kwezo cookies ziyimfuneko kwiNkonzo oyicelileyo, akukho cookie iya kuhlala kwisixhobo sakho, kwaye asiyi kugcina naziphi na iinkcukacha eziqokelelwego kwii-cookie, ixesha elide kunokuba kuvunyelwa ngumthetho.

## **Amalungelo akho malunga neenkukacha zakho**

Unelungelo:

- Lokwazi ukuba siqokelela, sisebenzise, okanye sabelane ngeenkukacha zakho njani kwaye ucele ukufikelela kwezi nkukacha
- Lokucela ukuba silungise iinkcukacha zakho ukuba azichanekanga okanye aziphelelanga
- Lokusicela ukuba sicime iinkcukacha zakho ukuba
  - linkcukacha zakho azisafuneki ngenxa yeenjongo ebeziqokelelwego, zisetyenziswe, okanye kwabelwane ngayo yona
  - Urhoxisa imvume apha ukuqokelelwego, ukusetyenziswa okanye ukwabelana kusekelwe khona
  - Uchasa ukuqokelelwego, ukusetyenziswa okanye ukwabelana kwaye akukho mdla ungaphaya usemthethweni wokuqhubeka nokuqokelelwego, ukusetyenziswa okanye ukwabelana.
  - Uchasa ukuqokelelwego, ukusetyenziswa okanye ukwabelana ngeenkukacha zakho ngeenjongo zokuthengiswa okuthe ngqo
  - linkcukacha zakho ziqokelelwego, zasetyenziswe, okanye kwabelwana ngazo ngokungekho semthethweni
  - linkcukacha zakho kufuneka zicinywe ukuze kuthotyelwe isinyanzeliso somthetho

- linkcukacha zakho ziqokelelwe ukuze kunikezwe iinkonzo ze-intanethi ebantwaneni
- Ukufumana isithintelo kuthi ekuqokelelweni, ekusebenziseni okanye ekwabelaneni ngeenkukacha zakho ukuba
  - Uphikisana nokuchaneka kweenkcukacha zakho
  - Awuvumanga kuqokelelwe, kusetyenziswe okanye kwabelwane ngokubhekisele kumdla osemthethweni kwaye sithathela ingqalelo into yokuba izizathu zethu okanye ezomdla osemthethweni zeqela lesithathu ziyawodlula na umdla wakho.
  - Ukuqokelelwa, ukusetyenziswa okanye ukwabelana akukho semthethweni, kwaye uyakuchasa ukucinywa kwaye ucele ukuba ukusetyenziswa kunyinwe endaweni yoko
  - Asisafuni zinkcukacha zakho, kodwa ufuno iinkcukacha zakho ukuseka, ukusebenzisa okanye ukukhusela ibango elisemthethweni
- Ukukwazi ukuzithathela kuwe iinkcukacha osinike zona kunye nokudlulisela ezo nkukacha komnye umbutto apho ukuqokelela esikwenzileyo, ukusetyenziswa okanye ukwabelwana ngezo nkukacha kuqhutywa ngeendlela ezizenzekelayo kwaye kusekelwe kwimvume yakho okanye ekusebenzeni kwekhontrakthi.
- Ukuchasa ukuqokelelwa, ukusetyenziswa okanye ukwabelana ngokubhekisele kwinjongo zomdla osemthethweni okanye ukwenziwa komsebenzi osemthethweni, ukuthengisa ngokuthe ngqo kunye nophando lwezesayensi/lwembali kunye neenkukacha manani.
- Ukungaxhomekeki kwisiggibo esisekwe kuphela kucubungulo oluzenzekelayo (kubandakanya iprofayile) oluvelisa iziphumo zomthetho malunga nawe okanye olukuchaphazela kakhulu.
- Ukufaka isikhala zo kugunyaziwe olawulayo

## Indlela owasebenzisa ngayo amalungelo akho

Ungafikelela, ulungise, okanye ucime iinkcukacha zeakhawunti yakho okanye urhoxise iakhawunti yakho nangaliphi na ixesha ngokuthi usithumele i-imayile ku-[legal@datacubed.com](mailto:legal@datacubed.com). Nceda uqaphele ukuba kwezinye iimeko sinokugcina iinkcukacha ezithile malunga nawe njengoko kufunwa ngumthetho.

## Umthetho olawulayo

Imithetho ye-EU ilawula uMgaqo-nkqubo.

## linguqu kuMgaqo-nkqubo

Lo Mgaqo-nkqubo kungokunje uQalisa ukuSebenza ngoMhla ochazwe ngasentla. Sinokuwutshintsha uMgaqo-nkqubo kumaxesha ngamaxesh, ngoko ke qiniseka ukuba uyawujonga ngamaxesh, athile. Siza kuthumela naluphi na utshintsho olwenzekayo kuMgaqo-nkqubo kwiwebhusaythi yethu u-[www.datacubed.com](http://www.datacubed.com).