



# I-VIRTUAL PRIVACY POLICY

The company i-Virtual, whose head office is located 24 route de Longeville in Scy-Chazelles (57160) (hereinafter the “**Company**” or “**we**”) is aware of the importance of privacy and of individual freedom. Thus, we commit ourselves to ensure protection of your personal data in compliance with the applicable law, in particular the regulation EU n°2016/679 of 27 April 2016 (hereinafter the “**Regulation**” or “**GDPR**”) and the modified French Data Protection Act of 6 January 1978.

The aim of this privacy policy (hereinafter the “**Policy**”) is to inform you about the principles governing how we process your personal data as a controller and as a processor under the Regulation.

## 1. Processing carried out as a controller

### 1.1. Types of personal data and purposes of processing

#### 1.1.1. Internet users and visitors of our website

As you navigate through our website [www.ivirtual.fr](http://www.ivirtual.fr) (hereinafter the “**Site**”), the Company may process the following types of personal data:

- **Identity data:** name, surname, e-mail address;
- **Professional life data:** company;
- **Location data:** country;
- **Technical data:** information obtained from cookies;
- **Other:** content of your message.

These personal data are processed only in a lawful manner for the purposes set out below:

| Processing purposes                                                       | Legal basis                                                                       |
|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| Management of the Site and of the requests for information (contact form) | The Company's legitimate interest to respond to requests and develop its activity |
| Analysis of the Site traffic                                              | The Company's legitimate interest in managing traffic on its website              |

#### 1.1.2. Customers or prospects

As a customer or a prospect, the Company may process the following types of personal data:

- **Identity data:** name, surname, signature, image;
- **Professional life data:** type of company, name of the company, postal address, position, e-mail address, phone number;
- **Financial information:** number of measures taken on Caducy, average basket;
- **Technical data:** information about the device used (version, operating system, etc.);
- **Location data:** city, region, country;



- **Other:** social network profiles, content of exchanges, customer opinions, satisfaction levels, comments, statistics from the Site and social networks.

These personal data are processed only in a lawful manner for the purposes set out below:

| Processing purposes               | Legal basis                                                                                                                |
|-----------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| Commercial leads management       | The Company's legitimate interest to develop its activity                                                                  |
| Customer management               | The Company's legitimate interest to manage its commercial relations<br>Legal obligations under the French Commercial Code |
| External communication management | The Company's legitimate interest to communicate online                                                                    |
| Caducy management in SaaS mode    | The Company's legitimate interest to improve its solution                                                                  |

### 1.1.3. Partners and suppliers

As a partner or a supplier, the Company may process the following types of personal data:

- **Identity data:** name, surname, signature, image;
- **Professional life data:** name of the company, postal address, position, e-mail address, phone number, RPPS number (French Health Professionals Shared Directory), resume;
- **Location data:** city, region, country;
- **Others:** clinical trial reports, content of exchanges.

These personal data are processed only in a lawful manner for the purposes set out below:

| Processing purposes        | Legal basis                                                                                                                     |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| Quality management         | The Company's legitimate interest to increase the reliability of its medical device<br>Legal obligations under CE certification |
| Clinical trials management | Legal obligations under clinical trial regulations                                                                              |
| Suppliers' management      | The Company's legitimate interest to call on suppliers for products or services                                                 |

### 1.1.4. Users of software developed by i-Virtual (Caducy)

The company identifies two categories of users:

- Individuals who use Caducy to measure their physiological variables;
- Individuals taking part in the tests carried out by i-Virtual to improve Caducy, particularly in terms of measurement accuracy, and to develop new services, such as the measurement of a new physiological variable.

As a Caducy's user, the Company may process the following types of personal data:

- **Identity data:** images, video, age, taille, weight, gender;



- **Health and well-being data:** PhotoPlethysmoGraph (PPG) signal, heart rate, respiratory rate, systolic blood pressure, diastolic blood pressure, cardiac variability characteristics, stress level, oxygen saturation, physiological age, good health indicator;
- **Other:** consent form to participate in tests, authorisation form for image rights.

i-Virtual may also store your results, but only in an anonymised form, for the purposes of continuous improvement of the solution and statistical analysis.

i-Virtual guarantees the anonymized nature of the data. The data stored in this way does not under any circumstances allow i-Virtual to identify and/or re-identify the data subjects.

These personal data are processed only in a lawful manner for the purposes set out below:

| Processing purposes           | Legal basis                                                              |
|-------------------------------|--------------------------------------------------------------------------|
| Research management           | Your consent to participate in tests for the purpose of improving Caducy |
| Caducy development management | The Company's legitimate interest to develop Caducy                      |

## 1.2. Data retention

The collected personal data are processed for no longer than is necessary to achieve the purposes for which they were collected, taking into account the applicable limitation periods and the principle of proportionality, in particular:

| Data subjects                              | Data retention                                        |
|--------------------------------------------|-------------------------------------------------------|
| Partners, suppliers, clients               | 5 years since the end of our contractual relationship |
| Prospects                                  | 3 years since your last contact                       |
| Internet users and visitors of the website | 25 months                                             |
| Caducy users and test participants         | Time required to communicate vital parameters         |

## 1.3. Personal data recipients

Internally, and depending on the processing, the recipients of personal data are:

- The direction;
- The QA/RA department (Quality Assurance and Regulatory Affairs);
- The sales & marketing department;
- The R&D department.

Your personal data may also be transferred to public organisation such as the National Agency for the Safety of Medicines and Health Products (ANSM) and the Protection of Persons



Committee (PPC), as well as to private organisation in order to meet regulatory obligations, in particular our notify body for CE certification and our certified public accountant.

Finally, your personal data may also be transferred to our processors within the scope of their missions, and in particular to our IT service providers, for the provision of collaborative tools (e.g. mailboxes) and data hosting of Caducy.

Your personal data may be transferred to a country outside the European Union. In such case, we systematically take all the necessary measures to ensure that the recipients of personal data provide a level of protection adequate and equivalent to the national and European regulations, in particular by signing standard contractual clauses of the European Commission applying technical, organisational and legal measures to improve the supervision of these transfers.

## 1.4. Modality to exercise your rights as a data subject

In accordance with the applicable law, you have the right:

- To access and rectify your personal data (right of access and to rectification);
- To object to the processing of your personal data, for legitimate reasons (right to object);
- Within certain limits provided by the law, to request the restriction of the processing of your personal data or the deletion of your personal data (right to restriction of processing and to erasure);
- To request the portability of your personal data (right to data portability);
- To withdraw your consent.

You may contact us:

- By e-mail: [privacy@i-virtual.fr](mailto:privacy@i-virtual.fr);
- By postal mail: i-Virtual, addressed to the DPO, 2 rue Maurice Barrès, 5700 Metz.

You also have the right to lodge a complaint to the French data protection authority, the CNIL, regarding the way we process your personal data.

## 2. Processing carried out as a processor

### 2.1. Types of personal data and purposes of processing

When i-Virtual makes its Caducy solution available to its customers, i-Virtual processes the personal data it receives only on the instructions of those customers. Therefore, in accordance with the Regulation, i-Virtual is a processor and its clients are controllers.

In its capacity as processor, i-Virtual may process the following types of personal data:

- **Identity data:** images, video;



- **Health and well-being data:** PPG signal, heart rate, respiratory rate, heart variability, stress level, blood pressure.

We would like to emphasise that your personal data is only stored temporarily by i-Virtual for the purposes of analysing it, extracting your vital parameters and communicating these results to you and/or your healthcare professional as appropriate.

We will under no circumstances disclose your personal data to any unauthorised third party without your consent, and we will not transfer your data to any country outside the European Union.

## 2.2. Modality to exercise your rights as a data subject

To exercise your rights regarding the personal data that we process as a processor, please contact the organisation or healthcare professional who invited you to use our Caducy solution.

## 3. Security measures

We are committed to preserve the confidentiality, integrity and availability of your personal data. In accordance with Article 32 of the GDPR, we implement appropriate technical, logical and organizational measures to ensure a level of security adapted to the risks involved in the processing of your personal data. We also have ways to prevent, as far as possible, any loss, accidental destruction, alteration and unauthorized access to your personal data.

When using Caducy, your personal data is entrusted to a certified health data hosting (HDS). i-Virtual has selected OVH Healthcare, which is a certified service provider (certificate no. 37387-1).

## 4. Data protection officer

We have designated the company EDOS, whose head office is located 9 rue Schimper in Strasbourg (67000) as our Data Protection Officer (hereinafter “DPO”).

You can contact our DPO at the following addresses for any question relating to this Policy or for any request related to the processing of your personal data: [privacy@i-virtual.fr](mailto:privacy@i-virtual.fr)

## 5. Update of the policy

The company may change this Policy from time to time. We will ensure that you are informed of such changes by a special notice on our Site.