

Personal data protection policy

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Drafting and validation committee:

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- Roland Sicard: CEO

Privacy is a fundamental right and one of Thess Corporate's core values.

THESS CORPORATE complies with French and European regulations on the protection of personal data, in particular the General Data Protection Regulation (EU) of 27 April 2016 ("GDPR") and the Data Protection Act of 6 January 1978 as amended ("LIL").

THESS CORPORATE's commitment goes beyond its legal obligations. Since its launch, THESS CORPORATE has been meeting several commitments to protect the personal data of customers who use its services.

THESS CORPORATE has a person dedicated to the protection of personal data, DPO (Data Protection Officer declared to the CNIL).

The personal data of customers using our software solutions are, in the case of health data, hosted by a hosting provider that has received HDS (Health Data Hosting) certification, validated by the ANS (Digital Health Agency).

Health data is hosted in Villeurbanne (France) with data redundancy in a second data center located in Paris (France). The Subcontractor providing the HDS-certified infrastructures is Ciril Group, whose registered office is located at 49 Avenue Albert Einstein B.P. 12 074 69603 VILLEURBANNE CEDEX.

PURPOSE OF THIS POLICY

THESS CORPORATE would like to inform you through this policy of how it and its staff protect personal data processed through our software solutions.

This policy describes the way in which THESS CORPORATE and its customers who are users of our software solutions process the personal data of the software solutions and users (hereinafter the "User(s)") when they browse these software solutions (hereinafter the "Software Solution") and their use of THESS CORPORATE's services or its web applications (hereinafter the "Application").

Some of the User's Personal Data are sometimes personal health data, and are hereinafter referred to as "Personal Health Data".

This Policy may be modified, supplemented or updated in order to comply with any legal, regulatory, jurisprudential and technical developments. However, the User's Personal Data is always processed in accordance with the policy in force at the time of its collection, unless a mandatory legal requirement provides otherwise and applies retroactively.

This policy is an integral part of the Terms and Conditions of Use for our Software Solutions.

IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLERS

Legal reminder: The data controller is, within the meaning of the law, the person who determines the means and purposes of the processing. The processor is a person who processes personal data on behalf of the controller. It acts under the authority of the controller and on the instructions of the controller.

The Data Controller is:

For Personal Data collected through each Software Solution or Application. Each professional operating the software solution or administrator of the software solution is considered to be responsible for the processing of users' Personal Data, while THESS CORPORATE is a subcontractor.

Whether it is a data controller or a subcontractor, THESS CORPORATE takes the appropriate measures to ensure the protection and confidentiality of the Personal Data it holds or processes on behalf of its customers in compliance with the provisions of the Law and the GDPR. For more information regarding the services offered by THESS CORPORATE's software solutions, you can refer to the General Terms and Conditions of Use specific to each Software Solution.

DATA COLLECTION & ORIGIN

All data concerning Users is collected directly from them, via the interface of our software solutions after the consent of the general terms and conditions of use.

THESS CORPORATE undertakes to systematically obtain the consent of the Users of these software solutions and to allow them to object to the use of their data for certain purposes, as soon as necessary.

In the general terms and conditions of use of THESS CORPORATE's software solutions, Users are informed of the purposes for which their data is used and of this Data Protection Policy.

MAIN PURPOSES OF THE DATA COLLECTED

1. Necessity of collection.

When registering or activating the service of our software solutions, the User must communicate certain Personal Data essential to the operation of the software solution (e.g. Last name, first name, email address, telephone number). If the User does not wish to provide the information requested, the User may not be able to access the Software Solution, and THESS CORPORATE may be unable to respond to his request.

2. Purposes

The legal basis for the collection of Personal Data is the following:

- The legitimate interest of THESS CORPORATE or its customers distributing the Software Solution to ensure the best quality of its services, to provide Users with full use of the functionalities offered by the Software Solution, and to improve the functioning of the Software Solution;
- The legitimate interest of THESS CORPORATE or its customers distributing the software solution to produce anonymised statistical data relating to the purpose of the software solution and in order to communicate about its tool and improve its services;
- The legitimate interest of THESS CORPORATE or its customers who distribute the software solution to carry out optional surveys on its services with a view to improving them;
- The consent of its Users when required by the regulations in force, in particular with regard to commercial prospecting and cookies.



The data of Users of THESS CORPORATE's software solutions or its customers who distribute the software solution are mainly processed for:

- Enable them to browse the Software Solution
- Possibly put them in touch with a Healthcare Professional or a consulting service

In the alternative, Users' data is also collected to:

- Preventing and combating computer fraud (spamming, hacking, etc.)
- Improve navigation on the Software Solution
- To conduct optional surveys on the services of THESS CORPORATE or its customers who distribute the software solution and their possible developments (these surveys are carried out anonymously or are anonymised at short notice)

The mandatory or optional nature of the personal data requested and the possible consequences of a failure to respond to THESS CORPORATE Users are specified at the time of their collection(s).

TYPES OF PROCESSED DATA MOST OFTEN PROCESSED BY OUR SOFTWARE SOLUTIONS

THESS CORPORATE may regularly process, directly or as a **Data Processor**, the following data:

- Name (and birth name), first name, date of birth
- Telephone number, email address, postal address (possibly digicode)
- Password
- Date of birth or age
- Social data
- Behavioral data
- Data belonging to the medical record that the Healthcare Professional wishes to share with the User or another Healthcare Professional belonging to the patient's care team
- Connection and usage data of the Software Solution or the Application
- Computer hardware used for browsing, IP address, password
- Login and usage data

NON-DISCLOSURE OF PERSONAL DATA

The User's Personal Data will not be transmitted to commercial or advertising actors. Any statistical processing for the purposes of epidemiological studies, scientific studies and activity monitoring or billing will be done only with anonymous and non-discriminatory data.

The User's Personal Data may be processed by THESS CORPORATE directly or as a **Data Processor**, in full compliance with the principle set out above, exclusively in order to achieve the purposes of this policy.

Within the limits of their respective responsibilities and for the purposes recalled above, the main people likely to have access to the data of THESS CORPORATE users are mainly the computer engineers responsible for the IT maintenance and technical administration of the software solutions.

In addition, in order to comply with the provisions of the Public Health Code concerning Personal Health Data, THESS CORPORATE uses Health Data Hosts (known as "HDS") with certification validated by the ANS (the Digital Health Agency).

DATA RETENTION PERIOD

We store the data only for as long as is necessary for the purposes for which it is pursued, in accordance with the legal requirements.

USER RIGHTS

Whenever THESS CORPORATE, directly or as a **Data Processor**, processes Personal Data, THESS CORPORATE takes all reasonable measures to ensure the accuracy and relevance of the Personal Data with regard to the purposes for which THESS CORPORATE processes it.

In accordance with the European regulations in force, THESS CORPORATE Users have the following rights:

- Right of access (Article 15 GDPR) and rectification (Article 16 GDPR), updating and completeness of Users' data
- the right to block or erase personal Users' data (Article 17 of the GDPR), when they are inaccurate, incomplete, ambiguous, outdated, or the collection, use, communication or storage of which is prohibited
- Right to withdraw consent at any time (Art. 13-2c GDPR)
- Right to restriction of the processing of Users' data (Article 18 GDPR)
- Right to object to the processing of Users' data (Article 21 GDPR)
- Right to the portability of the data that Users have provided, when this data is subject to automated processing based on their consent or on a contract (Article 20 GDPR)
- The right to determine the fate of Users' data after their death and to choose to whom THESS CORPORATE should communicate (or not) its data to a third party that they have previously designated

As soon as THESS CORPORATE becomes aware of the death of a User and in the absence of instructions from him/her, THESS CORPORATE undertakes to destroy his/her data, unless their retention is necessary for evidentiary purposes or to meet a legal obligation (such as the retention of the patient file).

If the User wishes to know how THESS CORPORATE uses his/her Personal Data, request to rectify it or object to its processing, the User may contact THESS CORPORATE in writing at the following address: THESS CORPORATE – DPO, Péripark Bât 2B - 137 Rue Claude Balbastre - 34 070 Montpellier or by email at dpo@thess-corp.fr. In this case, the User must indicate the Personal Data that he/she would like THESS CORPORATE or its customer distributor of the software solution to correct, update or delete, by identifying him/her in a precise manner with a copy of an identity document (identity card or passport) or any other element that can be used to prove his/her identity. Requests for the deletion of Personal Data will be subject to the obligations imposed on THESS CORPORATE, or its distributor client, by law, in particular with regard to the retention or archiving of documents. Finally, Users of THESS CORPORATE's software solutions may file a complaint with the supervisory authorities, and in particular with the CNIL (<https://www.cnil.fr/fr/plaintes>).

SECURITY

THESS CORPORATE implements all technical and organizational measures to ensure the security of the processing of personal data and the confidentiality of Personal Data.

As such, THESS CORPORATE takes all necessary precautions, with regard to the nature of the data and the risks presented by the processing, in order to preserve the security of the data and, in particular, to prevent them from being distorted, damaged, or accessed by unauthorized third parties (physical protection of the premises, authentication processes with personal and secure access via confidential identifiers and passwords, logging connections, encrypting certain data, etc.).

PERSONAL AND MINOR INFORMATION

In principle, the Software Solution and the Application are intended for adults who are capable of contracting obligations in accordance with the legislation of the country in which the User is located.

The User who is a minor under 15 years of age or incapable must obtain the prior consent of his or her legal guardian prior to entering his or her data on the Software Solution and the Application. Unless there is a legal

obligation of confidentiality or related to medical confidentiality, THESS CORPORATE may directly inform this controller (i) of the specific categories of Personal Data collected from the minor (ii) of the possibility of objecting to the collection, use or storage of the same.

CONTACT US - DPO CONTACT INFORMATION

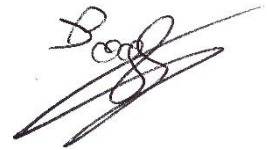
If the User has any questions or complaints regarding THESS CORPORATE's or its distributor client's compliance with this Policy, or if the User wishes to provide THESS CORPORATE with recommendations or comments aimed at improving the quality of this Policy, the User may contact THESS CORPORATE in writing at the following address: THESS CORPORATE – DPO, Péripark Bât 2B - 137 Rue Claude Balbastre 34 070 Montpellier or by email at dpo@thess-corp.fr

ADDITIONAL DEFINITIONS

For the purposes of this Supplement, the following expressions have the following meaning:

- **Mobile Application** means one of THESS CORPORATE's software solutions available from a smartphone as a result of downloading it from an application store.
- **Mobile Software Solution** refers to one of THESS CORPORATE's internet software solutions accessible from a smartphone.

Done in Montpellier



Yves Boge
DPO Thess Corporate