

I-VIRTUAL PRIVACY POLICY

i-Virtual whose head office is located 12b impasse Chaplerue in METZ (57000) (hereinafter “**the company**” or “**we**”) is aware of the importance of protecting privacy and individual freedoms. Consequently, we are dedicated to safeguarding personal data in compliance with applicable law, specifically the EU Regulation N°2016/679 of April 27, 2016 (hereinafter referred to as the “**Regulation**”) and the French Law n°78-17 of January 6, 1978, on Information Technology, data files and individual liberties as amended.

The purpose of this privacy policy (hereinafter “**Policy**”) is to inform you about the principles governing our processing of your personal data. We act as data controllers or as processor as defined by the applicable Regulation.

1. Processing carried out as a data controller

1.1. Categories of personal data and purposes of processing

1.1.1. Internet Users and site visitors

When you visit and interact with our website www.ivirtual.ai (hereinafter the « **website** »), we may process the following categories of data:

- **Identification and contact data:** surname, first name, email address;
- **Professional data:** company, business sector, function;
- **Location data:** country;
- **Technical and usage data:** data from cookies;
- **Other:** content of your message.

Purposes of data processing	Legal basis
Management of the Site and requests for information ('contact' form)	Our Legitimate interest in responding to requests and developing our activity
Analysis of website traffic	Our Legitimate interest in analysing traffic (cf our cookie policy)
Management of GDPR requests by Data Subjects	Legal Obligation

1.1.2. Prospects and customers

We may process the following categories of data relating to our prospects and customers:

- **Identification and contact data:** surname, first name, signature, image;
- **Professional data:** type of company, company name, postal address, position, e-mail address, telephone number;

- **Economic and financial data:** invoices, average basket;
- **Technical and usage data:** device information (version, operating system);
- **Location data:** city, region, country;
- **Other:** social networks profiles, content of exchanges, contracts, number of measures consumed, customer opinions, level of satisfaction, comments, statistics from the Site and social media platforms.

The personal data collected are only used for the purposes described below, in accordance with their respective legal basis.

Purposes of data processing	Legal basis
Management of commercial prospecting	Our Legitimate interest in developing our commercial activity
Customer Management	Our Legitimate interest in managing our commercial relations Legal obligations (under the French Commercial Code)
Communication management	Our Legitimate interest in communicating online
Billing management	Our Legitimate interest in billing for our services and products
Accounting management	Legal Obligation
Customer satisfaction management	Our Legitimate interest in improving our products
Management of GDPR requests by Data Subjects	Legal Obligation

1.1.3. Partners and providers

We may process the following categories of data relating to our partners and providers:

- **Identification and contact data:** surname, first name, signature, image;
- **Professional data:** company name, postal address, position, e-mail address, telephone number, RPPS number (Shared Directory of Health System Professionals), CV;
- **Location data:** city, region, country;
- **Other:** clinical study reports, content of exchanges.

The personal data collected are only used for the purposes described below, in accordance with their respective legal basis:

Purposes of data processing	Legal basis
Quality management	Our Legitimate interest in increasing the reliability of its medical device Legal obligations (arising from CE certification)
Clinical affairs management	Legal obligation (arising from clinical trial regulations)
Supplier management	Our Legitimate interest in being able to call on suppliers for products or services
Supplier payment management	Our Legitimate interest in paying our suppliers

Purposes of data processing	Legal basis
Accounting management	Legal Obligation
Management of GDPR requests by Data Subjects	Legal Obligation

1.1.4. Users of software developed by i-Virtual

The company differentiates between two categories of users:

- People who use i-Virtual's software to measure their physiological variables;
- People who take part in i-Virtual's tests in order to improve its software, particularly in terms of measurement accuracy, and to develop new services, such as the measurement of a new physiological variable.

As a Caducy user, the Company may process the following categories of data:

- **Identification and contact data:** identifier number, images, videos;
- **Demographic data:** age, height, weight, gender;
- **Health and well-being data:** Photo Plethysmo Graph (rPPG) signal, heart rate, respiratory rate, systolic blood pressure, diastolic blood pressure, cardiac variability characteristics, stress level, oxygen saturation, visual age, cardiovascular health score, blood pressure risk, BMI estimate;
- **Other:** participation consent form, image rights authorization form, measurement token.

i-Virtual may also securely store your results to improve the solution continuously and conduct statistical analysis.

The personal data collected are only used for the purposes described below, in accordance with their respective legal basis.

Purpose of processing	Legal basis
Research management	Consent to participate in tests for the purpose of improving its software Our Legitimate interest in developing its software
Software development management	
Management of GDPR requests by Data Subjects	Legal obligation

For our R&D, we collect data either directly from Users, or indirectly through organizations that have gathered the data, in the latter case, i-Virtual's use of the data is regulated by contractual agreements.

For certain processing operations, i-Virtual employs artificial intelligence techniques. Your data is automatically processed to assess your risk of hypertension. This classification is based on your demographic information and parameters extracted from the rPPG signal, aligned with the scientific literature defining hypertension risk criteria.

1.2. Retention periods

Personal data is retained only for as long as necessary to fulfil the intended purposes, while considering applicable limitation periods and the principle of proportionality, in particular:

Data subject	Retention period
Partners, suppliers, clients	5 years after the end of our contractual relationship
Prospects	3 years from your last contact with us.
Internet users	See cookies policy
Users	Duration of your consent

1.3. Recipients of data

Internally, the recipients of personal data are the departments that require access depending on the type of processing.

Your data may be shared with public entities such as the French National Agency for the Safety of Medicines and Health Products (ANSM) and the French Committee for the Protection of Individuals (CPP), as well as private entities in order to fulfill regulatory obligations, including our notified body for CE marking, our chartered accountant and our data protection officer.

Lastly, your data may be shared with our processors, particularly our IT service providers for the provision of collaborative tools (e.g. e-mail box) and software data hosting.

Your data may be transferred to countries outside the European Union. In such cases, we take systematic measures to ensure that recipients comply with protection standards equivalent to national and European regulations. This includes signing standard contractual clauses issued by the European Commission and implementing technical, organizational, and legal safeguards to control such transfers.

Additionally, we entrust the hosting of test participants' data to an HDS-certified service provider based in France.

1.4. How to exercise your rights

Pursuant to applicable legislation, you are entitled to the following rights in relation to your personal data:

- Right to Access and rectify your personal data (right of access and rectification);
- Right to Object to the processing of your personal data where such processing is based on legitimate interests (right of opposition);
- Right to request within the limits provided for by law, that the processing of your personal data be restricted or that the data be deleted (right to restriction and right to deletion);
- Right to Request the portability of your personal data (right to portability);
- Right to Withdraw your consent.

You can contact us:

- By email: privacy@i-virtual.ai ;
- By postal mail: i-Virtual, à l'attention du DPO, 2 rue Maurice Barrès, 57000 Metz.

Furthermore, you retain the right to file a complaint with the supervisory authority, namely the Commission Nationale de l'Informatique et des Libertés (CNIL), regarding the processing of your personal data.

2. Processing carried out as a data processor

2.1. Categories of personal data and purposes of processing

When i-Virtual provides its software to customers, it processes the data entrusted to it exclusively according to their instructions. As a result, under the Regulation, i-Virtual is a data processor while its customers are considered data controllers.

As a data processor, i-Virtual is responsible for processing the following personal data of users of its solution:

- **Identification and contact data:** identification number, images, videos;
- **Demographic data:** age, height, weight, gender;
- **Health and wellness data:** Photo Plethysmo Graph (rPPG) signal, heart rate, respiratory rate, systolic blood pressure, diastolic blood pressure, cardiac variability characteristics, level of stress, oxygen saturation, visual age, cardiovascular health score, blood pressure risk, BMI or BMI estimate
- **Other:** measurement token.

For certain processing operations, i-Virtual employs artificial intelligence techniques. Your data is automatically processed to assess your risk of hypertension. This classification is based on your demographic information and parameters extracted from the rPPG signal, aligned with the scientific literature defining hypertension risk criteria.

Please note that your video images are temporarily stored by i-Virtual solely for the purpose of analysis, extracting your vital parameters and sharing the results with you and/or your healthcare professional as appropriate. The images are then promptly deleted.

We will never share your personal data with unauthorized third party without your consent, nor do we transfer your data to countries outside the European Union.

2.2. How to exercise your rights

To exercise your rights regarding the personal data we process as a data processor, please contact the organization who invited you to use our software.

3. Security measures

We are committed to maintaining the confidentiality, integrity, availability and security of your personal data. In accordance with Article 32 of the Regulation, we implement appropriate technical, logical and organizational measures to ensure a level of security tailored to the risks associated with processing your personal data. Additionally, we take steps to prevent, as far as possible, any loss, accidental destruction, alteration or unauthorised access to your personal data.

As part of using our software, your personal data is entrusted to a certified health data host (HDS). i-Virtual has selected OVH Cloud as its certified service provider (certificate no. 37387-4).

4. Data protection officer

We have appointed EDOS, whose registered office is located at 9 rue Schimper in Strasbourg, as our Data Protection Officer (DPO).

You can contact our DPO at the following address if you have any questions about this policy or if you have queries about the processing of your data: privacy@i-virtual.ai

5. Policy Updates

i-Virtual may modify this Policy if necessary. We will inform you of any changes through a notice on our website or a personalized notification. For transparency, we also keep previous versions of our Privacy Policy available online.