

Caducy Confidentiality Policy

Effective date: 1 September 2021

1. Who are we?

i-Virtual (“**i-Virtual**”, “**we**” or “**us**”) is a simplified joint stock company, with head office at 24 route de Longeville, 57160 Scy-Chazelles, France, entered on the Register of Trade and Companies for Metz under number 807 466 693, and is the publisher of Caducy.

i-Virtual designed Caducy and makes it available to you via your preferred telemedicine service.

2. What is the applicable legal and regulatory framework?

Within the framework of the use of Caducy, i-Virtual processes certain personal data concerning you (that is, any information about you which makes you directly or indirectly personally identifiable), in accordance with the data protection regulations applicable in France and in the European Union (“Applicable data protection regulations”), including in particular:

- French Act No. 78-17 of 6 January 1978 on Information Technology, Data Files and Civil Liberties, as amended, and any updates thereof;
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (hereinafter referred to as the “GDPR”);
- The applicable provisions of the French Public Health Code;
- If applicable, any texts adopted within the European Union and local laws that might apply to personal data processed within the framework of our relationship.

3. How are your personal data processed?

3.1. Categories of personal data

As the processor, i-Virtual processes the following categories of data:

- Video data: image and video;
- Health and/or well-being data: heart rate, respiratory rate, heart rate variability and stress level;
- All and any information provided on contact with i-Virtual.

3.2. Purposes and lawfulness of processing

The personal data collected through the use of Caducy are used solely for the following purposes, on the associated legal basis:

Purpose of the processing	Legal basis
Analysis of vital signs and	Performance of a contract (GTCU)

generation of results	
Customer relationship management (after-sales service and non-compliance)	

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

i-Virtual guarantees that the anonymised nature of the data stored in this way does not make it possible under any circumstances to identify and/or re-identify the data subjects, therefore such data do not constitute personal data.

4. How long are your personal data stored?

The personal data processed within the framework of the provision and use of Caducy are only stored for the period strictly necessary for the purposes set out above.

We hereby draw your attention to the fact that your data are only stored temporarily by i-Virtual in order to analyse them (images), extract your vital signs from them (the results) and communicate these results to you and/or your health professional as appropriate.

5. Who are your personal data sent to?

Your personal data are sent to the following recipients:

- Our partners who have integrated Caducy into their platforms;
- Our other processors (and in particular our certified Health Data Hosting (Hébergement des Données de Santé - HDS) host, OVH Healthcare)
- The health professionals who receive the results from Caducy;
- Any authorised person pursuant to a legal or regulatory obligation.

We will not under any circumstances share your personal data with an unauthorised third party without your agreement.

In addition, we hereby inform you that your personal data are not transferred outside the European Union.

6. How do we protect your personal data?

We are committed to ensuring the confidentiality, integrity, availability and security of your personal data.

In accordance with Article 32 of the GDPR, we strive to implement all technical, logical and organisational measures necessary and appropriate to ensure the level of security most appropriate to the risks presented by the processing of such personal data.

We also put in place means to prevent, as far as possible, any loss, accidental destruction, alteration or unauthorised access to such personal data.

These measures include in particular storing your personal data in a secure operating environment only accessible to authorised persons bound by an obligation to maintain the confidentiality of your data.

In addition, your personal data are entrusted to a certified health data host (Hébergement des Données de Santé - HDS). i-Virtual has selected OVH Healthcare, which is a certified service provider (certificate no. 37387-1).

7. Will our policy change?

We reserve the right to amend our confidentiality policy at any time in accordance with the applicable data protection regulations.

Any amendments are immediately applicable and will be stated at the beginning of the confidentiality policy with the corresponding effective date.

8. What are your rights?

In accordance with the applicable regulations, you have the right of access, the right to rectification, the right to object, the right to restriction of processing, the right to erasure and the right to data portability with respect to your personal data.

Due to how Caducy operates and in particular the security measures applied, such as the absence of storage of your personal data, the exercising of certain rights may be limited.

In any event, you may send a request to exercise one or more of the rights set out above to us using the contact details given below.

You also have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL - French National Commission for Information Technology and Civil Liberties).

9. How to exercise your rights or contact our Data Protection Officer

i-Virtual has appointed a Data Protection Officer ("DPO").

Questions relating to the processing of your personal data can be sent to the DPO at the following addresses:

- By post: i-Virtual, A l'attention du DPO, 2 rue Maurice Barrès, 57000 Metz, France
- By email: privacy@i-virtual.fr

So that the DPO can check your identity, all requests must be accompanied by a copy of an identity document (national identity card, passport, driving licence, etc.), which will be deleted once the check is complete.