

## Privacy Policy

The Evolucare Technologies Group (hereinafter the "Evolucare Group") is committed to respecting the privacy and security of personal data to which it has access in the course of its business. Personal data refers to any information relating to an identified or identifiable individual.

All processing of personal data carried out for the use of our systems and services complies with the applicable regulations on the protection of personal data and in particular the provisions of the French Data Protection Act of 6 January 1978 as amended and the General Data Protection Regulation (EU Regulation 2016/679), the "GDPR" (hereinafter collectively the "Applicable Regulations").

Ensuring the security and confidentiality of personal data is a top priority for the Evolucare Group. The purpose of this Privacy Policy is to tell you how Evolucare Technologies processes personal data and what measures are in place to protect it.

### What is the Evolucare Group's commitment to privacy?

The Evolucare Group is committed to the protection of personal data. It is committed to ensuring a high level of protection of the personal data of its candidates, prospective customers, partners, customers and more generally of the users of the products and services it markets, to which it has access.

The Evolucare Group undertakes to comply with the Regulations applicable to all processing of personal data that it operates. More specifically, the Evolucare Group undertakes to adhere to the following principles:

- **lawfulness, fairness, transparency:** your personal data is processed in a lawful, fair and transparent manner,
- **purpose limitation:** your personal data is collected for specified, explicit and legitimate purposes and is not further processed in a way that is incompatible with these purposes,
- **data minimization:** your personal data is kept in an adequate, relevant way and limited to what is necessary for the purposes for which it is processed,
- **accuracy:** your personal data is accurate, kept up to date and all reasonable steps are taken to ensure that inaccurate data, as regards the purposes for which it is processed, is erased or rectified without delay.

Evolucare Group implements the appropriate technical and organizational means to guarantee the security of your data in accordance with the risks inherent in the processing operations carried out, right from the design of said processing.

Similarly, the Evolucare Group contractually imposes the same level of personal data protection on its subcontractors (service providers, suppliers, etc.).

Evolucare Group undertakes to comply with all other principles required by the Applicable Regulations, in particular with regard to the rights conferred on the persons concerned, the periods of retention of personal data and the obligations relating to cross-border transfers of personal data, where applicable.

### In which cases is the Evolucare Group responsible for processing?

The data controller is the natural or legal person who, alone or jointly with others, determines the purposes and means of processing.

For example, in the context of its management of applicants, prospects, clients, commercial contracts and its websites, the companies of the Evolucare Group act as data controllers.

The Evolucare Group company responsible for processing varies according to the processing concerned: **Evolucare Technologies - Corwin - ETMCP**

## In which cases is the Evolucare Group your processor?

A processor is a natural or legal person who processes personal data on behalf of the controller. In the context of the implementation and use of Evolucare Group products and services under contracts with Evolucare Group companies, you may also process personal data as a data controller.

If an Evolucare Group company accesses or otherwise processes personal data on your behalf to enable the use of its products or the provision of its services, then, and only then, does the company act as a processor within the meaning of the Applicable Regulations.

In this context, the Evolucare Group undertakes to comply with all the provisions of the Applicable Regulations for processors, and in particular to implement appropriate technical and organizational measures, in order to:

- ensure data security,
- offer products that respect the principles of protection by design and by default.

## Who does Evolucare Group process personal data for?

Personal data is only accessible to authorized personnel and when strictly necessary.

In addition, depending on the processing concerned and exclusively in order to achieve the purposes presented in this Privacy Policy, personal data collected by the various means mentioned above, may be communicated and/or shared with:

- other companies in the Evolucare Group,
- subcontractors (service providers) and partners of the Evolucare Group. We remind you that in this context, the Evolucare Group requires its service providers and partners to implement strict confidentiality and data protection measures.

Lastly, the Evolucare Group may be obliged to transfer personal data at the request of legal authorities or, more generally, if a legal or regulatory provision requires it to do so.

## What personal data does Evolucare Group collect?

### What data?

In accordance with the principle of minimization under the GDPR, we only collect and process data that is strictly necessary for the purposes set out in this Privacy Policy.

In particular, the following categories of personal data may be processed: surname, first name, address, email address, password, telephone number, job title, IP address, connection data and navigation data, order history, membership organization, photo.

Evolucare Group does not collect or process personal data from children under the age of 16 without the prior consent of the child's parents or guardians.

In certain circumstances, and only when we are acting as a processor on your behalf, we may have access to personal data that you process as a data controller in the course of using our products and services. The processing of this data is carried out in strict compliance with your instructions as defined contractually.

In this context only, given the core business of our customers, we may have access to health data. Evolucare Group implements appropriate and relevant security measures to ensure the confidentiality and integrity of such data, in compliance with Applicable Regulations, legal and regulatory provisions specific to health data, where applicable, and the state of the art.

### Where does the data come from?

We collect information when:

- You complete an Evolucare technologies contact form,
- You visit our website,
- You post comments on our social networking pages,
- You submit an application,
- You send us requests (exercise of rights, product actions, etc.),
- You subscribe to a newsletter,
- We draw up a quote/contract with you,
- Where applicable, and depending on the nature of the products and/or services concerned, we execute the contract between us and you.

## What is the purpose of the personal data that may be collected by the Evolucare Group?

### Purposes of your processing

Personal data is processed for specific, explicit and legitimate purposes. Depending on the case, personal data may be used for the following purposes:

- communicating with our prospective customers and clients, and providing them with the documentation necessary for the preparation of our sales proposals,
- to enable our users, customers and partners to benefit from all the products and/or services offered by the Evolucare Group,
- to manage our business relationship and in particular to contact you and to facilitate the administrative formalities necessary to process your requests and invoicing,
- to enable you to browse our sites and, where applicable, to send you an application or subscription to a newsletter or newsletters.

We may also use your personal data for administrative purposes or for any other purpose under the legislation in force.

### Legal basis

Your personal data is processed based on different grounds (legal bases) depending on the use we make of the personal data (purpose concerned).

The legal bases for our main processing operations are as follows:

- **consent:** you agree to the processing of your personal data by means of an express consent (checkbox, acceptance banner). You can withdraw this consent at any time,
- **contract:** personal data must be processed to perform the contract to which you have consented,
- **legitimate interest:** Evolucare Group has a business interest in processing your data, in particular to improve its products and services, customer relations as well as commercial prospecting which is justified, balanced and does not infringe on your privacy. With certain exceptions, you may object to processing based on legitimate interest at any time by notifying the Evolucare Group,
- **legal or regulatory provisions:** the processing of your personal data is compulsory pursuant to a legal or regulatory text.

## How long is your personal data kept?

Personal data is kept in accordance with the legal provisions for a period not exceeding that necessary for the purposes for which it is collected and processed.

## Is personal data ever transferred outside the European Union?

Evolucare Group does not transfer any personal data collected to a country outside of the European Union, without first informing you, and only if required by the contract with you or by applicable law.

## Who is involved in the protection of personal data?

### Our Data Protection Officer (DPO)

If you have any questions regarding the protection of personal data, you can contact the DPO at the following address.

**Groupe Evolucare Technologies, DPO, Parc des Grillons – Bâtiment 4  
60, route de Sartrouville, F-78230 Le Pecq  
dpo@evolucare.com**

### Our Information Systems Security Manager (ISSM)

The Evolucare Group has appointed an Evolucare Technologies ISSM. The ISSM ensures the proper management of information security within the Evolucare Group. The ISSM supports the teams on security issues and raises awareness among employees.

## What are your rights and how can you exercise them?

In accordance with the Applicable Regulations, you may, at any time, exercise your rights of access, rectification, deletion of data concerning you as well as your rights to limit and oppose the processing and portability of your personal data.

These rights can be exercised at any time, either:

- online, via a form (when available),
- by post to our DPO (see address above),
- by email to our DPO (see address above)

In this context, we kindly ask you to include the elements necessary for your identification (surname, first name, email, company name) as well as any other information necessary to confirm your identity with your request.

Where the relevant Evolucare Group company acts as a processor, you are responsible for ensuring that the rights of the data subjects are respected. The relevant Evolucare Group company will, to the extent possible and in accordance with the Applicable Regulations, assist you in meeting this obligation.

## How do we safeguard your personal data?

Evolucare Group implements all appropriate technical and organizational measures, in accordance with the state of the art, with regard to the nature, scope and context of the personal data we collect and the risks presented by its processing, to preserve the security of your personal data and, in particular, to prevent any accidental or unlawful destruction, loss, alteration, disclosure, intrusion or unauthorized access to this data.

Through these measures, we ensure a high level of confidentiality and protection of health data that may be hosted and processed.

The security and confidentiality of personal data depends on the good practices of each individual. For this reason, we encourage you not to share your personal data with third parties who may be impersonating the Evolucare Group.

The Evolucare Group has established a procedure for handling personal data breaches. In the event that a personal data breach as defined by the GDPR is detected, the Evolucare Group undertakes to communicate this breach to the French supervisory authority, the Commission Nationale de l'Informatique et des Libertés (CNIL), and in the event of a high risk, to inform you as soon as possible.

## Cookies management

The site uses an anonymous statistical monitoring solution for traffic and navigation. In accordance with regulatory requirements, when you first visit the site, you can refuse this tracking by simply clicking on the "I object" button in the message at the bottom of your screen.

If you continue to browse the site without refusing, we will be able to carry out statistical monitoring which will only enable us to analyse the use of our site in order to improve and enhance it. The duration of this consent is 13 months maximum.

Your choice is stored on your computer or mobile device only. The request is therefore likely to be resubmitted to you if you change your device, browser or reset your cookies.

You can restore your consent if you have withdrawn it, or revoke it if you have given it, on the privacy policy page of an Evolucare Group site.

## Changes

Evolucare Group reserves the right to adapt this Privacy Policy, in particular according to the legal and regulatory context and the doctrine of the CNIL and undertakes to inform you on its website of any changes or amendments.