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PRIVACY NOTICE OF THE WEBSITE (GDPR)

This privacy notice applies to data processing related to the use of the Visible Patient website.

Visible Patient is responsible for processing personal data and is therefore committed to complying with the General Data Protection Regulations ("GDPR") and all applicable data protection laws and regulations. Visible Patient wants to make sure that you understand what personal information is collected about you, how it is used and how it is kept secure.

General warning

The access to the website <https://www.visiblepatient.com/> (hereinafter referred to as "Website") implies full and unreserved acceptance by the user of this Website Privacy Notice (hereinafter "Notice"), as well as its general conditions of use and the Cookie Policy.

The User acknowledges having read the information below and authorizes Visible Patient to process, in accordance with the provisions of the Notice, the personal data that he/she communicates on the Website.

The Notice is valid for all pages hosted on the Website. It is not valid for pages hosted by third parties to which Visible Patient may refer and whose privacy policies may differ. Visible Patient can therefore not be held responsible for the data processed on these sites or by them.

I. What personal data do we collect?

First name, last name, email address and supplementary personal data, including potential personal health data, if you voluntarily provide it in our contact form.

Specific case of the Professional Section / Download of VP Planning software

First name, last name, email address, version of downloaded software, country of download, operating system and download date.

For US Residents only: In addition to the personal data listed above, your postal address will be collected to enable us to comply with our legal obligations.

II. Why do we use your personal data?

We use your personal data in order to respond to requests and queries about Visible Patient or obtaining a 3D model, that you submit to us by completing the form on the Website.

Specific case of the Professional section / Download of VP Planning software

We use your data in order to comply with our legal obligations relating to the use of the VP Planning



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solution. Indeed, we must be able to contact you to send you any new information relevant to the proper use of the version you downloaded.

III. On what basis do we use your personal data?

We consider it to be in our legitimate interest to process the personal data that you have voluntarily provided us in order to answer your questions and inform you about obtaining your 3D model.

Specific case of the Professional section / Download of VP Planning software

We use your data in order to comply with our legal requirements related to the use of the VP Planning solution.

IV. How long will we keep your personal data?

We keep the personal data that you have provided us for as long as we have direct contact with you and they are necessary to respond to your requests or queries, in the context of the services provided and for the corresponding legal retention period, for example the retention period for accounting documents is 10 years in France. We will delete them at the end of this period.

Specific case of the Professional section / Download of VP Planning software

We will keep your personal data for a period in accordance with the legislation in force.

V. How is your personal data shared?

We do neither sell nor rent your personal data to third parties.

We only transmit your personal data to our suppliers and subcontractors to the extent necessary to achieve the objective of processing your personal data. This is for example OVH, email host.

All our suppliers and subcontractors are located in the European Economic Area (EEA).

VI. How do we protect your data?

Visible Patient treats your personal data as confidential and uses at least the same level of care to protect your personal data as it uses for its own confidential information of a similar nature.

Your personal data is contained in secure networks and is accessible to a limited number of persons only who have special access rights to such systems and who are required to maintain the confidentiality of the information.

VII. Your rights



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According to GDPR, you have following rights:

- **Access.** You have the right to obtain confirmation of whether or not personal data about you has been processed and, where applicable, all the information necessary to make the process transparent.
- **Rectification.** You have the right to ask for rectification of incorrect data about you.
- **Deletion.** You have the right to ask for the deletion of your data.
- **Restriction of processing.** You have the right to restrict the processing of your data under certain specified circumstances.
- **Objection.** You have the right to object at any time, for reasons related to your particular situation, to the processing of your data.

Specific case of the Professional section / Download of VP Planning software

By virtue of the legal obligation to which Visible Patient is bound, you will not be able to exercise your right to deletion or your right to object the processing.

If you wish to exercise one or more of these rights, please let us know by contacting our DPO, Visiblepatient.dpo@mydata-trust.info; +33 9 70 70 20 09. Please note that none of the above rights are absolute and your requests will be subject to a case-by-case analysis by our DPO.

You also have the right to lodge a complaint with the Data Protection Authority in your country or with the Data Protection Authority where the alleged breach was committed.

VIII. Contacts

Visible Patient

8 Rue Gustave Adolphe Hirn
6700 Strasbourg, FRANCE
Email address: contact@visiblepatient.com

Data Protection Officer MyData-Trust SA.

Boulevard Initialis 7/3
7000 Mons, FRANCE
+33 9 70 70 20 09

Visiblepatient.dpo@mydata-trust.info

Data Protection Authority

Commission Nationale de l'Informatique et des Libertés (CNIL)
Place de Fontenoy 3,
TSA 80715,
75334 PARIS CEDEX 07, FRANCE
+33 1 53 73 22 22

https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

INFORMATION NOTE FOR CUSTOMERS/SUPPLIERS/PROSPECTS OF VISIBLE PATIENT (GDPR)

I. Why an Information Note?

VISIBLE PATIENT, as the controller of your personal data, gives high priority to your privacy and is committed to protecting your personal data.

Through this Information Note, VISIBLE PATIENT (“VP”) would like to inform you about how your personal data is collected and processed. The purpose of this note is to ensure that the protection and management of your personal data is carried out appropriately and responsibly in compliance with the applicable legislation, in particular in accordance with the General Data Protection Regulation (hereinafter referred to as “the GDPR”).

II. What is meant by the processing of personal data within the meaning of the “GDPR”?

- **Personal data** is any information of any kind and regardless of its medium, which makes it possible to directly or indirectly identify a natural person. Thus, your last name, first name, e-mail address and any other data necessary for the performance of the contract binding us is considered as personal data.
- **Processing of personal data** is defined by any act of manipulation or use of personal data such as collection, use, recording, storage, communication, dissemination, modification, deletion or anonymization.

III. Who is this Information Note for?

The present Information Note is intended for customers, prospects, suppliers and any person likely to be in a contractual relationship with VP in the context of management of its commercial activity.

Consequently, this Note is intended to apply to processing implemented for the purposes of managing commercial activities, whether implemented using internal tools or outsourced to a service provider, and which lead to collect data relating to natural persons.

IV. Who is responsible for the processing of your personal data?

In accordance with the GDPR, VP acts as the controller for the processing of your personal data, i.e., it determines the purposes of processing your data and the means with which it processes them. In this sense, VP is responsible for processing and protecting your personal data in compliance with the legislation in force and more particularly in compliance with the GDPR.

The address of VISIBLE PATIENT is 8 rue Gustave Adolphe Hirn 67000 Strasbourg, France.

As required by the GDPR, VP has appointed a Data Protection Officer, more commonly known as a "DPO", who can be contacted at the following address: visiblepatient.dpo@mydata-trust.info.



V. What data categories do we process about you?

The execution of the contract leads us to collect and process a series of data that you have provided us. This also covers the data collected during precontractual contacts, in particular during negotiation phases.

Data categories collected about you and processed by VP may be the following:

- **Identification data:** Civility, name or business name, first name, address (including head office, place of invoicing), phone number, fax number, email addresses, internal processing code allowing the identification of the customer, accounting identification code, SIREN number.
- **Contact data:** professional electronic address, professional mailing address, professional phone number.
- **Professional data:** current position.
- **Data linked to payment:** payment, terms and conditions of payment (e.g., discounts, advance payment, rebate), RIP/RIB, cheque number, credit card number, expiration date of the credit card, visual cryptogram, credit terms, duration, method of payment used, transaction number, purchase details, subscription details, details of goods or service.
- **Data linked to transaction:** transaction number, purchase details, subscription details, details of goods or service.
- **Data linked to the follow-up of the business relationship:** requests for documentation, articles, purchased products, services covered by the order and the invoice, quantity, amount, periodicity, order and invoice date and amount, due date of the invoice, delivery conditions and address, purchase and service history, origin of the sales (vendor, representative, partner, affiliate) / The order, invoices, correspondence with the customer and the customer service, interaction and comments of customers and prospects, people in charge of the customer relationship.
- **Data for solicitations:** data required for carrying out prospecting, study, survey and promotion actions.

This data is collected directly from you by the authorized persons of VP.

If you do not provide your data, in some cases we may not be able to fulfill our obligations. We will inform you, if necessary, of the consequences of the absence of communication of this data.

VI. Why do we process your personal data? On what legal grounds do we process your data? How long do we keep them?

In general, the data that we process about you is dedicated exclusively to the purposes of contract management and prospecting operations. It will be used to manage our relationship with you in an efficient, lawful and adequate manner, whether during the negotiation, during the performance of the contract that binds us, at the time of the termination of the contract or after the end of the contract.

In particular, your data is processed for the following purposes:

<i>Purposes</i>	<i>Legal grounds</i>	<i>Retention period</i>
Contract management		
Orders, deliveries, customer service	Performance of the contract	Duration of the contractual relationship (except data processed to meet purposes related to accounting obligation as described in Article L. 123-22 paragraph 2 of the French Commercial Code)



<i>Purposes</i>	<i>Legal grounds</i>	<i>Retention period</i>
Accounting requirements, tax obligations, etc.	Compliance with a legal obligation to retain data (e.g., obligation to ensure the identity of the person by requesting the provision of proof of identity)	In the form of an intermediate archive: legal retention period (e.g., 10-year accounting obligation)
Management of pre-litigation and litigation	Legitimate interest of the organization in establishing proof of a right or contract	Duration of the related prescription (civil, commercial, etc.)
Prospecting operations		
Electronically (for sending e-mail, SMS, voice automaton, etc.)	Consent	Until withdrawal of the consent or 3 years from last contact
By post or human intervention	Legitimate interest of the organization subject to allowing people to oppose it beforehand and at any time	
Aimed at professionals		
For similar goods and services		
Licensing of data		
Electronic data (in order to send email, SMS, automatic call, etc.)	Consent	Until withdrawal of the consent

VII. Who processes your personal data and who do we share it with?

Your personal data is only accessible and processed by persons authorized to do so and according to the performance of their duties within VP. These people are aware of the confidentiality and security of personal data as well as their legitimate use. Access authorizations are documented and subject to traceability measures

For the purposes set out above, your personal data may also be shared with:

- Our administration/finance department and department directors/managers;
- VP Management;
- Any authority to which we are legally required to communicate your data (for example, social and tax authorities);
- Affiliates of VP, third parties, partners or subcontractors (technical service providers) acting under the responsibility of VP;
- Service providers specializing in taxation;
- Judicial officers;
- Banking organizations

VIII. Is your data transferred outside the EEA/EU?

Some recipients of your personal data may be located outside the European Union (EU) or the European Economic Area (EEA) where personal data protection measures may be less restrictive. In this case, VP undertakes to transfer your data taking the existing adequacy decisions into account. If the country in which the recipient is located does not benefit from an adequacy decision, VP undertakes to put in place appropriate guarantees such as standard contractual data protection clauses as recognized by the European Commission.

IX. What are the security measures taken by VP to protect your personal data?

All necessary measures are taken in order to preserve your personal data when collected, transmitted and



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stored in order to improve the accuracy and comprehensiveness of recorded data. Furthermore, technical and organizational measures are taken on a daily basis to ensure the accuracy and relevance of your personal data as well as to prevent any loss, damage and access, unauthorized modification or transfer.

X. What are your rights and how to exercise them?

As a data subject, you have a number of rights regarding the processing of your personal data. Subject to our legal obligations and a case-by-case analysis by our DPO, you have the possibility to exercise the following rights:

- Access right: you have the right to obtain confirmation that your personal data is processed by VP or not, and if need be, you can obtain precise information about the processing of your data. You also have the right to ask for a copy of all the information held about you.
- Right of rectification: you have the right to ask us to rectify, in particular by completing or modifying all or part of the information held about you.
- Right to erase ("right to be forgotten"): you have the right to ask us the deletion all the information we hold about you from our systems.
- Right to restriction of processing: you can ask us that some of your data is not processed. They are then said to be locked.
- Right to data portability: you can ask to recover your information under a structured format, commonly used and machine-readable, in order to be able to transfer other processing controllers.
- Opposition right: you can oppose the processing of your personal data.
- Right to withdraw your consent: If you have given your consent to data processing, you have the right (in the cases provided for by the GDPR) to withdraw it at any time without, however, affecting the lawfulness of the processing for which you want to remove it

If you want to exercise one of your rights, you can contact the email addresses below by justifying your identity and clearly indicating the right(s) you want to exercise:

- You are a supplier: write to VP's **accounting department** (accounting@visiblepatient.com)
- You are a customer: write to the **commercial department** (info@visiblepatient.com)

Please note that these rights are not absolute. They shall always be subject to a case-by-case analysis by our DPO whom you can also directly contact (visiblepatient.dpo@mydata-trust.info) for any question or request. You also have the right to lodge a complaint with the Data Protection Authority of the Member State of the European Union of your habitual residence, your place of work or the alleged infringement if you believe that your personal data is not being processed in accordance with the GDPR.

You can find the contact details of the various European Data Protection Authorities via the following link:

https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

The present Information Note enters into force on February, the 1st, 2022.

Latest update: February, the 1st, 2022.

This document may need to evolve according to the needs for proper functioning or for changes in legal requirements. The latest version shall always be available on the intranet. You may also receive it upon simple request to the accounting department or the commercial department.