

PRIVACY POLICY

At Lifeaz, protecting your personal data is a priority.

The purpose of this policy is to inform you about how we process such data in compliance with Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (the "GDPR").

The following terms and phrases, when used with capitalized initials, shall have the meanings ascribed to them in the Terms and Conditions of Use for the Lifeaz Services (the "Services") offered on <https://www.lifeaz.co/> (the "Site").

When you sign up for the Services and use the Site and Services, we may process personal data about you.

1. Who is the data controller?

The data controller is Lifeaz, a simplified joint stock company, registered in the Paris Trade and Companies Register under number 814 042 958, with its registered office at 15 Rue Béranger, 75003 Paris (hereinafter: "We").

2. What data do we collect?

Personal data is data that can identify an individual directly or by cross-referencing with other data.

We collect data that falls into the following categories:

- Identification data (e.g. name, surname, email, delivery and billing address, telephone number);
- Data relating to your orders (e.g. CLARK product serial number);
- Browsing data (e.g. IP address, pages viewed, date and time of connection, browser used, operating system, user ID, IFA);
- Economic and financial data (e.g. bank details, credit card details, invoices);
- Data relating to our post-marketing clinical follow-up (Name, First name, email address, telephone number, postal address, CLARK serial number);
- Data relating to alerts raised by CLARK (serial number, information on the software and its operation, IP address of the Clark, identification data (surname, first name) and/or data relating to the private and/or professional life of the victim may be collected incidentally);
- Any information that you wish to send us in the context of your contact request.

When collecting your personal data, we inform you whether certain data must be filled in or whether they are optional. Mandatory data is marked with an asterisk and is necessary for the functioning of the Services. For optional data, you are free to choose whether or not to provide it. We also indicate the possible consequences of a failure to answer.

3. On what legal grounds, for what purpose and for what purpose are the data collected?

Goals	Legal basis	Self life
Execute your order, perform operations related to the management of your contracts, orders, deliveries, invoices, and follow-up of our contractual relationship.	Performance of the contract you or your company have with us.	<p>Personal data is kept for the duration of the contractual relationship.</p> <p>In addition, your data (with the exception of your bank details) are archived for evidential purposes for a period of 5 years.</p> <p>The data concerning your credit card is kept by our payment service provider until the price is paid in full.</p> <p>The data relating to the visual cryptogram or CVV2, registered on your bank card, are not stored.</p> <p>The data relating to your bank cards may be kept, for the purpose of proof in the event of a possible dispute of the transaction, in intermediate archives for a period of thirteen (13) months following the date of debit. This period may be extended to fifteen (15) months in order to take into account the possibility of using deferred payment cards.</p> <p>Your invoices are archived for 10 years.</p>
Build a file of customers and prospects	Our legitimate interest in developing and promoting our business	<p>For customers: data is kept for the duration of the contractual relationship.</p> <p>For prospects: data is kept for a period of 3 years from your last contact, for prospecting purposes.</p>

Manage the follow-up of alerts raised by our CLARKs	Manage the follow-up of alerts raised by our CLARKs	Retention of data for 15 years after the last device is placed on the market
Send our newsletter	For professionals: our legitimate interest in building customer loyalty and informing our customers of our latest news For individuals: your consent	The data is kept for 3 years from your last contact with Us or until you withdraw your consent.
Respond to your requests for information	Our legitimate interest in responding to your requests	The data is kept for the time necessary to process your request for information and deleted once the request for information has been processed.
Comply with legal obligations applicable to our business	Comply with our legal and regulatory obligations in accounting matters	Your invoices are archived for a period of 10 years.
Carry out a Post Market Clinical Follow-up as part of the CE marking of our CLARK products	Comply with our legal and regulatory obligations regarding medical devices	The data from the post-marketing clinical follow-up is kept for the life of your Clark product.
To elaborate statistics on the audience of the Site	Your consent	The data is kept for 2 years.

4. Who are the recipients of your data?

Your personal data will be made available to:

- (i) The authorized personnel of our company;
- (ii) Our subcontractors: hosting service providers, newsletter sending service providers, audience measurement tools, CRM tools, chatbot tools, online payment service providers, invoicing and bank transfer tools, data collection and display tools, telephony tools;
- (iii) Our delivery and logistics partners for your orders;
- (iv) If applicable: public and private organizations, exclusively to meet our legal obligations.

5. Is your data likely to be transferred outside the European Union?

Your data are preserved and stored during all the duration of the treatments on the servers of the AIRTABLE companies, located in the European Union, and GOOGLE CLOUD, located in Belgium in the European Union.

Within the framework of the tools which we use (see article on the recipients concerning our subcontractors), your data are likely to be the subject of transfers outside the European Union. The transfer of your data in this context is secured by means of the following tools:

- either the data is transferred to a country that has been the subject of an adequacy decision by the European Commission, in accordance with Article 45 of the RGPD: in this case, this country ensures a level of protection deemed sufficient and adequate to the provisions of the RGPD;
- or the data is transferred to a country whose level of data protection has not been recognized as adequate to the RGPD: in this case these transfers are based on appropriate safeguards indicated in Article 46 of the RGPD, adapted to each provider, including but not limited to the conclusion of standard contractual clauses approved by the European Commission, the application of binding corporate rules or under an approved certification mechanism
- or the data is transferred on the basis of one of the appropriate safeguards described in Chapter V of the GDPR.

6. What are your rights regarding your data?

You have the following rights with regard to your personal data:

- Right to information: this is precisely the reason why we have drawn up this policy. This right is provided for in Articles 13 and 14 of the GDPR.
- Right of access: you have the right to access all your personal data at any time, in accordance with Article 15 of the GDPR.
- Right of rectification: you have the right to rectify your inaccurate, incomplete or obsolete personal data at any time pursuant to Article 16 of the GDPR
- Right to limitation: you have the right to obtain the limitation of the processing of your personal data in certain cases defined in Article 18 of the GDPR.
- Right to erasure: you have the right to demand that your personal data be erased, and to prohibit any future collection of your personal data on the grounds set out in Article 17 of the GDPR
- Right to lodge a complaint with a competent supervisory authority (in France, the CNIL), if you consider that the processing of your personal data constitutes a violation of the applicable texts. (Article 77 of the GDPR)

- Right to define directives concerning the conservation, deletion and communication of your personal data after your death, in accordance with Article 40-1 of the French Data Protection Act.

- Right to withdraw your consent at any time: for purposes based on consent, Article 7 of the GDPR provides that you may withdraw your consent at any time. This withdrawal will not affect the lawfulness of the processing carried out before the withdrawal.

- Right to portability: under certain conditions specified in Article 20 of the GDPR, you have the right to receive the personal data you have provided to us in a standard machine-readable format and to require its transfer to the recipient of your choice.

- Right to object: under Article 21 of the GDPR, you have the right to object to the processing of your personal data. Please note, however, that we may continue to process your personal data despite this objection, for legitimate reasons or to defend legal rights.

You can exercise these rights by writing to us at the address below. We may ask you to provide us with additional information or documents to prove your identity.

7. What cookies do we use?

To learn more about cookie management, please see our Cookie Policy.

8. Personal data contact point OR Data Protection Officer

Contact email: sav@lifeaz.fr

Contact address: Lifeaz, 15 Rue Béranger, 75003 Paris

9. Changes

We may modify this policy at any time, in particular to comply with any regulatory, legal, editorial or technical developments. These modifications will apply as of the effective date of the modified version. You are therefore invited to regularly consult the latest version of this policy. Nevertheless, we will keep you informed of any significant changes to this Privacy Policy.

Effective date: 15/12/2022