

## **PRIVACY POLICY**

AMedSU - Apps for Medical And Surgical Use (We, Our or Us), French law SAS (limited share company), registered in the French Trade and Companies registry under the number 800 563 090, whose head office is situated Immeuble Nice Premium, 3ième étage, Bureau N°2-44, 61 Avenue Simone Veil, 06200, Nice (France) provides the Aesthetime online medical and aesthetic appointment booking and management services and associated technologies ('Platform').

All references to 'us,' 'we' and 'our' in this Privacy Policy are references to Aesthetime. All references to 'you' and 'your' in this Privacy Policy are references to:

- the general practitioners and employees of medical or aesthetic clinics who are customers, or potential customers, of our products and services ('Clinic Representatives');
- the patients of the medical or aesthetic clinics who use our Platform, and any other individuals who use our Platform or website to connect with a practitioner ('Patients');
- our contractors and suppliers, potential employees, and any other individuals we might deal with in the course of running our business or providing our services.

We are committed to protecting your privacy, and ensuring that the ways in which we deal with your personal information comply with the European General Data Protection Regulation and any other applicable health records legislation.

We may update this Privacy Policy periodically and without notice to you. You should review this Privacy Policy from time to time to review any changes. If you have any questions about this Privacy Policy, please contact us using the following email address : [support@amedsu.com](mailto:support@amedsu.com).

To provide our services we need to collect personal information which might also include health or other sensitive information ('Personal Information').

We may collect and hold your Personal Information for a range of reasons, such as to allow us to identify who an individual is before they access or use the Platform, to facilitate communications between Patients and their medical or aesthetic clinics, or to communicate or transact with individuals in the ordinary course of business.

### **If you are a Patient:**

- most Personal Information we collect about you will be received from you directly or, to optimise the functionality of the Platform or enable us to provide services to your medical or aesthetic clinic, from the medical or aesthetic clinic which you are a patient of or have booked an appointment with; and

The types of Personal Information we may collect, depending on the circumstances, include:

- general information such as your name, location, date of birth, Medicare details, family details including marital status, contact information (including your email address, telephone and fax number, residential, business and postal addresses), your user name for the Platform, and details of your use of, or access to, the Platform;
- health information such as information which might relate to your health, the health services which have been or are to be provided to you, or other information which falls within the scope of 'health information' as that term is defined in the GDPR

- other 'sensitive information' as that term is defined in the GDPRt (excluding health information, which is addressed above). We will only collect this type of information if you provide it to us directly;
- details of any communications or interactions you have with a medical or aesthetic clinic using the Platform;
- if you use or access our website or Platform, aggregated statistical information such as information about your online preferences and movements, location information, and other information which is typically obtained from cookies (although you can adjust your browser's settings to accept or reject cookies). This statistical information will be collected on an anonymized basis only;
- if you use or access our website or Platform for the Mobile Check In feature, we will need to access and collect your precise geo-location using the GPS in your device. We require this location to confirm you are within the clinic's pre-determined radius to enable check-in. We only access and collect the location at the point in time when you access the specific Mobile Check In feature. This means we may ask for your permission to access and collect your location information each time you use the feature. The location information collected will only be used to confirm your device's proximity to the clinic and to provide you with customer support relating to the Mobile Check In feature;
- any other Personal Information you send or disclose to us, including our records of any communications or interactions we have with you.

If you are a Clinic Representative:

- most Personal Information we collect about you will be received from you directly, your patients or potential patients, or the medical or aesthetic clinic which employs or otherwise engages you. However, and depending on the nature of your relationship (or potential relationship) with us, we may also collect your Personal Information from other sources such as advertising, public records, mailing lists, contractors, our staff and our business partners.

The types of Personal Information we may collect about you include:

- general information such as your name, location, date of birth, contact information (including your email address, telephone and fax number, residential, business and postal addresses), your log-in details for the Platform, and details of your use of, or access to, the Platform;
- financial information such as any of your bank or credit card details used to transact with us, or other financial information that allows us to transact with you or provide you with our services;
- details of any communications or interactions you have with a Patient using the Platform;
- as relevant to your relationship with us, information about your online preferences and movements, location information, trends, decisions and other information which is typically obtained from cookies (although you can adjust your browser's settings to accept or reject cookies), and other information about your preferences and purchases in relation to our products;
- information about your professional registration, associations or memberships;
- any other Personal Information you send or disclose to us, including our records of any communications or interactions we have with you.

The primary purposes for which we collect Personal Information are to enable the functionality of the Platform and provide you with our services.

If you are a Patient:

- we will never sell or exploit your Personal Information, or share it for any purposes which are unrelated to providing and operating our Platform;
- we will use your Personal Information (including your health and other sensitive information) for the primary purpose for which we collected it (for example, to contact you to confirm an appointment booking, or to provide details of that booking to your medical or aesthetic practitioner);
- we will only use your Personal Information for secondary purposes if you have provided your consent for us to do so, or if you might reasonably expect us to do so (for example, to investigate or respond to a complaint that you have raised with us, or to verify your identity if you have forgotten your user details for the Platform);

We maintain all Personal Information (especially health information) in strict confidence, and will only disclose it to third parties where:

- it is reasonably necessary to enable us to provide you with your use of the Platform, or to enable your medical or aesthetic practitioners to keep up to date records and communicate with you; or
- we are otherwise authorized or required to do so under relevant laws, such as if the disclosure is reasonably necessary due to law enforcement activities, or to lessen a serious threat to the life, health or safety of any individual.

The types of third parties that we might disclose your Personal Information to include:

- the medical or aesthetic clinic that you have previously had, or intend to book, an appointment with; and
- our service providers who support and enable us to provide our services, such as: our information technology, network, software and cloud storage providers, any practice management software providers which your medical or aesthetic practitioner uses and our external professional advisers (such as legal advisors).

If we do share or disclose your Personal Information as described above, we will always first consider whether we can reasonably de-identify or anonymize that information.

If you are a Clinic Representative:

We will use your Personal Information (including your financial information) for the primary purposes of providing you with our services or enabling your use of the Platform to communicate with your patients, such as to:

- communicate with you about an appointment or patient communication;
- monitor your use of the Platform or our services;
- enable patients to book appointments or communicate with you;
- verify your identity and perform billing and payment activities;

We may also use your Personal Information (including your financial information) for secondary purposes such as:

- communicating with you about your relationship with us, our goods and services, our own marketing and promotions or competitions, surveys and questionnaires.
- investigating any issues or complaints about, or made by, you or another individual, or if we have reason to suspect that you or another individual are in breach of any of our terms and conditions or have been otherwise engaged in any unlawful activity.
- any other purposes which are required or authorized by any laws.

We will only disclose your Personal Information to third parties where this is reasonably necessary to enable us to provide you with our services and the use of the Platform, or as is otherwise required or authorized by any laws.

The types of third parties we may disclose your Personal Information to include your patients or potential patients, any individuals or entities who access your details which are published via the Platform, the medical or aesthetic clinic which employs or engages you, our service providers such as those which provide us with our information technology, network, software and cloud storage providers; the practice management software provider used by the medical or aesthetic clinic which employs or engages you, subscription and mailing operations, billing and related financial functions; and our external professional advisers, such as legal advisors or accountants.

An individual may opt not to have us collect their Personal Information, or for us to de-identify any Personal Information we hold about them. This may prevent us from offering them some or all of our services and may terminate their access to some or all of the services, including via the Platform. To opt out, please contact us by email to: [privacy@amedsu.com](mailto:privacy@amedsu.com)

If an individual believes that they have received information from us that they did not wish to receive, they should also contact us on the details above.

We will take all reasonable precautions to protect your Personal Information from unauthorized access or disclosure, or misuse or loss. This includes appropriately securing our physical facilities and electronic networks.

Aesthetime uses standard industry encryption methods when storing and transferring Personal Information, and has implemented monitoring and access controls which regulate who can access particular information.

Your personal information will be stored in secure, encrypted electronic format and it will be stored in Ireland, in the servers owned by our cloud provider called AWS.

We will retain Personal Information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

You have the right to request access to, or correction of, the Personal Information that we hold about you.

If you would like to make a request to access, or correct, your Personal Information which is held by us, you can:

- if you are a user of the Platform, update some of your Personal Information from within your Platform account or profile;
- otherwise contact us using this email : [privacy@amedsu.com](mailto:privacy@amedsu.com)

If you cannot update or correct your Personal Information via the Platform, we will take reasonable steps to correct any errors in the Personal Information we hold about you within 7 days of receiving written notice from you about those errors, or to provide you with access to the Personal Information we hold within 28 days of a written request.

If you have a query or complaint about our handling of your Personal Information, please contact us in writing using the following address : [privacy@amedsu.com](mailto:privacy@amedsu.com).

We will aim to resolve the issue with you directly.

All questions, comments or requests regarding this Privacy Policy or the way in which we handle your Personal Information should be addressed to:

(a) by email: [privacy@amedsu.com](mailto:privacy@amedsu.com)

(b) by post: AMedSU - Apps for Medical And Surgical Use (We, Our or Us), Immeuble Nice Premium, 3ième étage, Bureau N°2-44, 61 Avenue Simone Veil, 06200, Nice (France).

You may contact the Privacy Officer by email in the first instance.

From time to time, we may need to change this Privacy Policy. If we do so, we will post the updated Privacy Policy on the same webpage.