HEALICO PRIVACY POLICY
USERS

Laboratoires Urgo ("**Urgo**"), registered with the Dijon Trade and Companies Register under number B 433 842 044 and whose registered office is at 42 rue de Longvic, 21300 Chenôve, France, specialises in the development of wound care products.

In order to facilitate the management of Patients' wounds, Urgo makes the Healico application (the "**Application**" or "**Healico**") available to healthcare establishments and Healthcare Professionals ("**Users**").

The purpose of this privacy policy ("**Privacy Policy**") is to describe the Processing of Personal Data carried out by Urgo:

- in respect of Users' Personal Data in connection with their use of Healico;

- in its capacity as Controller, in connection with its health data warehouse, so that such Data may be reused for research projects, studies or evaluations in the healthcare field (see the section entitled "Details of Processing carried out by Urgo in connection with the Health Data Warehouse").

Urgo undertakes to carry out all such Processing in accordance with all applicable privacy and personal data protection legislation and regulations, including, without limitation, the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the French Data Protection Act (Loi Informatique et Libertés), as amended ("LIL") (together, the "**Data Protection Regulations**").

1. Definitions

For the purposes of this Privacy Policy, capitalised terms such as "Personal Data" (or "Data"), "Processing", "Controller", "Processor" and "Recipient" shall have the meanings given to them under the Data Protection Regulations.

2. Details of Processing carried out by Urgo in connection with Healico

a. Purposes and Legal Bases

i. Processing carried out by Urgo as Processor

In connection with the User's use of Healico, Urgo may process, in its capacity as Processor, on behalf of the User (or the establishment in which the User practises), acting as Controller, the User's Personal Data for the following purposes:

- creation/management of the User's Healico account (where the User practises within a healthcare establishment or other organisation);

- support, maintenance and hosting of Healico;

- improvement of Healico's operation and performance;

where applicable, provision to the organisation in which the User practises of dashboards enabling the monitoring of Patients' wounds;

- transfer to Urgo's health data warehouse for reuse in connection with research projects, studies or evaluations in the healthcare field (**only for Users practising in France**).

The legal bases for such Processing are determined by the User, or by the healthcare establishment in which the User practises, acting as Controller.

ii. Processing carried out by Urgo as Controller

In connection with the use of Healico, Urgo may also process the User's Data, in its capacity as Controller, for the following purposes:

- creation/management of the User's Healico account (where the User is a self-employed Healthcare Professional): the legal basis for this Processing is the performance of a contract between Urgo and the User (Article 6(1)(b) GDPR);

- sending "service-related communications" (e.g. information concerning Healico's features): the legal basis for this Processing is Urgo's legitimate interest in providing the User with information in connection with their use of Healico (Article 6(1)(f) GDPR), and such Processing is carried out provided that the User has not previously objected;

- sending "transactional communications" (e.g. communications relating to Healico's security): the legal basis for this Processing is the performance of the contract between Urgo and the User (Article 6(1)(b) GDPR).

b. Recipients of the Data

The User's Personal Data may be accessed by the following recipients:

- Urgo's internal personnel, solely as required for the performance of their duties and responsibilities and within the limits of their respective roles;

- service providers acting as processors on behalf of Urgo (e.g. IT service providers involved in hosting Healico);

- public authorities, where applicable.

c. Retention Period for User Data

User Data processed in connection with the use of Healico are retained only for as long as strictly necessary for the purposes specified above. Where applicable, they may be retained for longer periods, up to the expiry of the applicable statutory limitation period.

3. Transfers of User Data outside the European Union

User Data processed in connection with the use of Healico in the United Kingdom are hosted in the United Kingdom. Transfers from the United Kingdom to France and other countries of the European Economic Area (EEA) are covered by UK adequacy regulations regarding the level of data protection.

4. Users' Rights in respect of their Personal Data

Where applicable, Users have the right, in respect of their Data processed (i) in connection with the use of Healico and (ii) within the Urgo Medical EDS, to access, rectify and erase their Data, to restrict the Processing of their Data and to object to such Processing. Users may also provide instructions concerning the handling of their Data after their death.

To exercise these rights, Users must:

- **for Processing carried out by healthcare establishments acting as Controllers in connection with the use of Healico**: contact the healthcare establishment in which they practise, in accordance with the procedures established by that establishment for Healthcare Professionals to exercise their rights;

- **for Processing carried out by Urgo as Controller in connection with the use of Healico and the Urgo Medical EDS:**
    - write to: Laboratoires Urgo, 42 rue de Longvic, 21300 Chenôve, France;
    - email Urgo's Data Protection Officer at: dpo@group.urgo.com.

Where applicable, Users may also lodge a complaint with the competent supervisory authority:

- For the United Kingdom: Information Commissioner's Office (ICO)