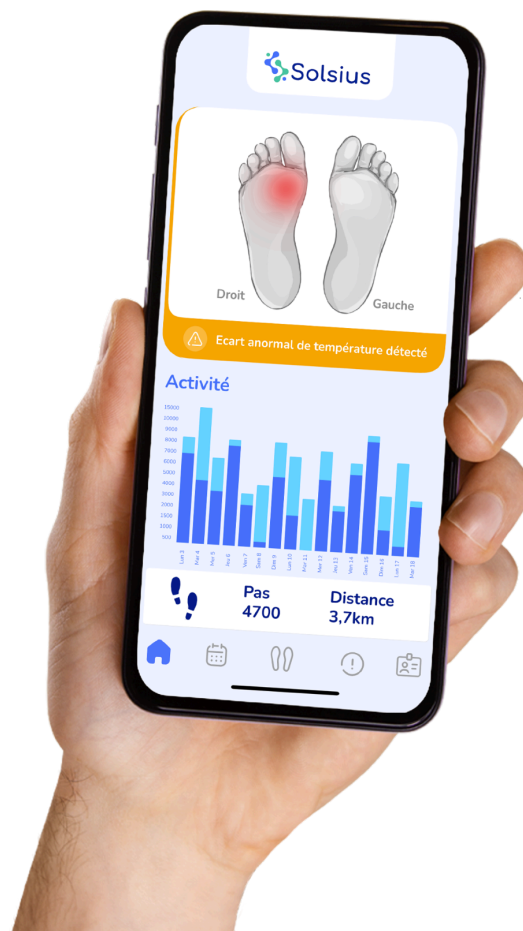




Privacy Policy of the Solsius SelfCare Mobile Application

Last Updated: November 2025



Preamble :

This privacy policy describes our policies and procedures regarding the collection, use, and disclosure of your information when you use the Service and informs you of your privacy rights and how the law protects you.

We use your personal data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this privacy policy.

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1. Interpretation and Definitions

1.1. Interpretation

Words with initial capital letters have meanings defined under the following conditions. The definitions shall have the same meaning whether they appear in singular or plural form.

1.2. Definitions

For the purposes of this privacy policy:

- The Company (referred to as "the Company", "We", or "Our" in this Agreement) refers to Solsius, 12 bis Rue des Tours, 59800 Lille.
- Account means a unique account created for you to access our Service or parts of our Service.
- Affiliate means an entity that controls, is controlled by, or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest, or other securities entitled to vote for the election of directors or other managing authority.
- Application refers to Solsius SelfCare, the mobile application provided by the Company.
- Insoles refer to the Solsius SelfCare connected insoles.
- Device means any device capable of accessing the Service, such as a smartphone or tablet.
- Personal Data means any information that directly or indirectly identifies an individual.
- Service refers to the Application as well as the Solsius SelfCare medical device.
- Service Provider means any natural or legal person who processes data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, provide the Service on behalf of the Company, perform services related to the Service, or help the Company analyze how the Service is used.
- Usage Data refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (e.g., the duration of a page visit).
- You means the individual accessing or using the Service, or the company or other legal entity on behalf of which such individual accesses or uses the Service.

2. Collection and Use of Your Personal Data

2.1. Types of Data

2.1.1. Personal Data

While using our Service, we may ask you to provide certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

- Email address
- First and last name
- Usage data
- Specific personal data: age, weight, date of birth, shoe size
- Medical data such as the names of healthcare professionals involved in your care, consultation dates, etc.

2.1.2. Usage Data

Usage Data is collected automatically when using the Service, starting from registration.

When you access the Service via a mobile device, we may automatically collect certain information, including but not limited to, the type of mobile device you use, the unique ID of your mobile device, your mobile device's IP address, your operating system, device identifiers, and other diagnostic data.

2.1.3. Location Data

When using the Application, we may use data related to the location of your smartphone. These data are never recorded and are used solely to ensure proper functionality, particularly optimizing communication between the Insoles and the Application.

Location usage allows:

- Waking the App in the background to automatically connect via Bluetooth to the Insoles worn by the user;

- Ensuring technical functionalities related to the use of the Insoles and the App without user intervention.

These data are in no way used for advertising or commercial purposes. They are strictly limited to technical use, exclusively to ensure proper operation of the Application and Device.

If location collection is not necessary, no data are recorded. If some features require your explicit permission, you will be clearly informed.

2.1.4. Information Collected While Using the Application

We collect your personal data for specific purposes and under different legal bases.

For the provision of our mobile Application, Solsius SAS uses personal data as follows:

Purpose	Data Types	Retention Period
Track foot temperature data for diabetic foot ulcer detection	Physiological data	5 years from last app use unless deletion requested earlier
Analyze physical activity to measure daily steps	Activity data	5 years from last app use unless deletion requested earlier
Manage your account and registration as an Application user	Email, Name, Unique ID, Login data	5 years from last app use unless deletion requested earlier
Collect and analyze clinical self-monitoring questionnaire responses	Personal data from clinical questionnaire	5 years from last app use unless deletion requested earlier

Resolve technical malfunction of connected insole	Patient name, podiatrist identity, phone number, email	Time strictly necessary to resolve the technical issue
Track dates of medical appointments and identify relevant healthcare professional	Healthcare professional data	3 years from date of last recorded appointment
Bluetooth operation and connectivity between Insoles and Application	Approximate or precise location data	Time necessary for Service operation, not stored or archived

2.2. Use of Your Personal Data

The Company may use Personal Data for the following purposes:

- **To provide and maintain our Service:** including to monitor the usage of our Service.
- **To manage your Account:** to manage your registration as a Service user. Personal data you provide may give you access to different features of the Service available to you as a registered user.
- **To contact you:** to contact you by email, phone calls, and SMS (if necessary) or other equivalent electronic communication forms, such as mobile app push notifications regarding updates or informative communications related to subscribed features, products, or services, including security updates, where necessary or reasonable.
- **To manage your requests:** to respond to and manage requests submitted to us.
- **For business transfers:** we may use your information to evaluate or conduct a merger, sale, restructuring, reorganization, dissolution, or any other sale or transfer of all or part of our assets, whether as a going concern or in bankruptcy, liquidation, or similar proceedings, in which personal data we hold about users of our Services is part of the assets transferred.
- **For other purposes:** we may use your information for purposes such as data analysis, identifying usage trends, determining the effectiveness of promotional campaigns, and evaluating and improving our Service, products,

marketing, and user experience.

We may share your personal information in the following situations:

- **For business transfers:** we may share or transfer your personal information in connection with or during negotiations of any merger, sale of company assets, financing, or acquisition of any or all of our business by another company.
- **With affiliates:** we may share your information with our affiliates, in which case we will require those affiliates to respect this privacy policy. Affiliates include our parent company and any other subsidiaries, joint venture partners, or other companies we control or are under common control with.

2.3. Retention of Your Personal Data

The Company will retain your personal data only as long as necessary for the purposes set out in this privacy policy. We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our agreements and legal policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period unless it is used to strengthen security or improve the functionality of our Service or if we are legally required to retain it for longer periods.

2.4. Transfer of Your Personal Data

Your information, including personal data, is processed at the Company's operational offices and in any other locations where the parties involved in the processing are located. This means that such information may be transferred to and stored on computers located outside your state, province, country, or other governmental jurisdiction where data protection laws may differ from those in your jurisdiction.

Your consent to this privacy policy followed by your submission of such information represents your agreement to this transfer.

The Company will take all reasonably necessary steps to ensure that your data is treated securely and in accordance with this privacy policy, and no transfer of your personal data will take place to an organization or country unless adequate controls are in place, including the security of your data and other personal information.

In fact, your data will be stored on a secure HDS (Health Data Host) server, ATE, a French host certified ISO/IEC 27001.

2.5. Your Rights – Access / Rectification / Deletion of Your Personal Data

You are the sole provider of the data we hold via the Application. You have rights regarding your personal data. In accordance with data protection regulations, particularly Articles 15 to 22 of the GDPR, and after verifying your identity, you have the right to request access to, rectification, or deletion of your personal data.

Regarding the personal data we collect, you can exercise the following rights:

- **Right of access (Article 15 GDPR):** You have the right to request access to the personal data we hold about you and can request a copy.
- **Right to rectification (Article 16 GDPR):** You may request correction of any inaccurate data concerning you.
- **Right to erasure or “right to be forgotten” (Article 17 GDPR):** You may request deletion of your personal data under certain circumstances.
- **Right to data portability (Article 20 GDPR):** Under certain conditions, you may receive all personal data concerning you that you provided to us, in a structured format, and can request that we transmit it, as far as possible, to another controller.
- **Right to object to processing based on legitimate interests (Article 21 GDPR).**
- **Right to define the fate of your data after death and choose whether we disclose it to a third party you designated (Article 40-1 of the French Data Protection Act).**

Additionally, within legal limits, you also have the right to object to processing, restrict processing, decide on post-mortem fate of your data, withdraw consent at any time, and the right to portability of the personal data provided.

You can contact our Services to exercise your rights at: dpo@solsius.fr or by mail at **12 bis Rue des Tours, 59800 Lille, FRANCE**, attaching a copy of an identity document.

2.6. Disclosure of Your Personal Data

2.6.1. Transactions commerciales

If the Company is involved in a merger, acquisition, or sale of assets, your personal data may be transferred. We will inform you before your personal data is transferred and becomes subject to a different privacy policy.

2.6.2. Law Enforcement

In certain circumstances, the Company may be required to disclose your personal data if required by law or in response to valid requests by public authorities.

2.6.3. Other Legal Requirements

The Company may disclose your personal data in good faith if it believes such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate potential wrongdoing in connection with the Service
- Protect the personal safety of Service Users or the public
- Protect against legal liability

2.7. Security of Your Personal Data

La sécurité de vos données personnelles est importante pour nous, mais n'oubliez pas qu'aucune méthode de transmission sur Internet ni aucune méthode de stockage électronique n'est sécurisée à 100 %. Bien que nous nous efforçons d'utiliser des moyens commercialement acceptables pour protéger vos données personnelles, nous ne pouvons garantir leur sécurité absolue.

3. Children's Privacy

Our Service is not directed to individuals under 18. We do not knowingly collect personal data from anyone under 18.

4. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We may also inform you by email and/or through a prominent notice on our Service before the changes take effect, and we will update the “Last Updated” date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Any modifications to this Privacy Policy take effect immediately upon being posted on this page.

5. Contacting the CNIL

You may at any time contact the “Commission nationale de l’informatique et des libertés” (CNIL) at the following address:

Service des plaintes de la CNIL, 3 place de Fontenoy – TSA 80751, 75334 Paris Cédex 07, France, or by phone at +33 1 53 73 22 22.

6. Contact Us

For any legal questions or requests for additional information regarding our Privacy Policy, you can contact us:

By email: dpo@solsius.fr

By postal mail:

Solsius SAS
12 bis Rue des Tours
59800 Lille, France

Please include:

- Your contact details (first name, last name, address, email)
- A specific reason related to your request, where required by law
- The legal basis justifying the exercise of your right to erasure