



PRIVACY AND PERSONAL DATA PROTECTION POLICY OF SIVAN INNOVATION AND SIVAN FRANCE

1 PROTECTION OF YOUR PERSONAL DATA.....	1
2 RESPONSIBILITY FOR PROCESSING.....	2
3 WHAT ARE THE COMMITMENTS OF SIVAN INNOVATION AND SIVAN FRANCE REGARDING THE PROTECTION OF PERSONAL DATA?.....	3
4 WHAT IS THE PURPOSE OF THE DATA LIKELY TO BE COLLECTED BY SIVAN INNOVATION and SIVAN FRANCE?.....	4
1. Data collection methods.....	4
a. Software and web applications developed by SIVAN INNOVATION and SIVAN FRANCE enabling medical monitoring of cancer (MOOV CARE®).....	4
b. Service associated with the use of MOOV CARE®.....	4
c. Data collection and processing in the context of the use of mobile applications, such as for screening for tobacco-related diseases and for providing information to the general public.....	5
d. Others.....	5
2. Purposes of processing and legal basis.....	6
5 HOW LONG IS YOUR DATA KEPT?.....	7
6 WHO IS LIKELY TO HAVE ACCESS TO YOUR PERSONAL DATA?.....	7
1. Recipients of your data.....	7
2. Data transfers outside the European Union.....	8
7 HOW TO EXERCISE YOUR RIGHTS?.....	9
8 USER-FRIENDLY SERVICES FROM SIVAN INNOVATION AND SIVAN FRANCE ONLINE, ON SOCIAL MEDIA AND ON YOUR MOBILE DEVICES.....	10
1. COOKIES.....	10
2. TAGS.....	12
9 COMPUTER SECURITY.....	12
10 CONTACT.....	13
11 MODIFICATIONS.....	13

1 PROTECTION OF YOUR PERSONAL DATA

SIVAN INNOVATION, as a manufacturer of software, web applications and mobile applications, and SIVAN France, as the importer for the manufacturer in Europe of software, web applications and mobile applications, are responsible for processing or subcontractors of processing, and are therefore likely to collect and process personal data concerning you (your personal data).

SIVAN INNOVATION and SIVAN France are committed to respecting the privacy of users of their products and visitors to their websites. All processing of personal data, whether in the context of visits to websites or the use of software, web applications and mobile applications, complies with applicable local regulations regarding the protection of personal data, and in



particular the provisions of the French Data Protection Act (law no. 78-17 of 6 January 1978, as amended) and the General Data Protection Regulation (EU Regulation 2016/679) or "GDPR", which will be summarized in this document under the heading "The Regulations".

To ensure the proper application of these rules, SIVAN INNOVATION and SIVAN France have appointed a joint Data Protection Officer, who serves as the primary liaison with the French Data Protection Authority (CNIL). SIVAN INNOVATION and SIVAN France also implement appropriate internal procedures to raise awareness among their employees and ensure compliance with these rules within their organizations.

This policy applies from the moment of connection or browsing on the websites, software or applications of SIVAN INNOVATION.

2 RESPONSIBILITY FOR PROCESSING

In the context of using web applications (such as MOOVCARE applications®), SIVAN INNOVATION and SIVAN France are responsible for processing the personal data of healthcare personnel: for the registration of the administrator account which will manage user accounts by healthcare establishment, and for the overall use of the applications by healthcare professionals.

The referring physicians (physicians prescribing the application(s)) or the healthcare centers, as applicable, are responsible for the processing of their patients' data and the processing of clinical data. SIVAN INNOVATION and SIVAN France then act as data processors for this processing.

As the distributor of MOOVCARE® in France, SIVAN France is responsible for the data processed for billing purposes. SIVAN France has signed the national agreement enabling direct billing to insured individuals. As a patient, you consent to this data processing by opting in to MOOVCARE® monitoring within the application.

In the specific case of providing an application or web application for conducting a clinical trial, the data controller is the study sponsor. When the study sponsor is not SIVAN INNOVATION or SIVAN France, SIVAN INNOVATION and SIVAN France then act as data processors for this processing.

In the context of the use of mobile applications such as SMOKECHECK®, SIVAN INNOVATION and SIVAN France are responsible for processing the personal data of users of these applications who do not carry out telecommunications.

SIVAN INNOVATION and SIVAN France are also responsible for the personal data processing of the following data, based on the legitimate interests of the companies:

- commercial management of professionals for the development of applications, web applications and software;
- commercial management of website visitors who complete the online contact form;
- From the management of processing records and procedures associated with the management of personal data.



- of the processing associated with continuous improvement processes, complaints management, materiovigilance file, post-market surveillance and technical support requests from application users where applicable.

SIVAN INNOVATION and SIVAN France are also responsible for the personal data processing activities based on consent:

- Surveys and email marketing;
- As part of setting up technical and professional support, your consent is required to receive assistance. Without your consent, no technical support can be provided.

3 WHAT ARE THE COMMITMENTS OF SIVAN INNOVATION AND SIVAN FRANCE REGARDING THE PROTECTION OF PERSONAL DATA?

SIVAN INNOVATION and SIVAN France are committed to ensuring a high level of protection of the personal data of users of software, applications, websites, and any other person whose personal data they process.

In the context of the operation of health software and applications, all personal data used is hosted by ISO 27001:2013 certified hosting providers for health data hosting or in compliance with HIPAA depending on your place of residence, whose contact details are specified below.

SIVAN INNOVATION and SIVAN France are committed to complying with the regulations applicable to all personal data processing activities. More specifically, SIVAN INNOVATION and SIVAN France are committed to respecting the following principles:

- Your personal data is processed lawfully, fairly and transparently (lawfulness, fairness, transparency).
- Your personal data is collected for specified, explicit and legitimate purposes, and is not further processed in a manner incompatible with those purposes (purpose limitation).
- Your personal data is kept in an adequate, relevant and limited manner to what is necessary for the purposes for which it is processed (data minimization).
- Your personal data is accurate, kept up to date and all reasonable steps are taken to ensure that inaccurate data, having regard to the purposes for which it is processed, is erased or rectified without delay (accuracy).

Furthermore, SIVAN INNOVATION and SIVAN France contractually impose the same level of personal data protection on their subcontractors (service providers, suppliers, etc.).

Finally, SIVAN INNOVATION and SIVAN France undertake to respect any other principle required by applicable regulations regarding the protection of personal data, and more specifically concerning the rights conferred on the persons concerned, the retention periods for personal data as well as the obligations relating to cross-border transfers of personal data.



4 WHAT IS THE PURPOSE OF THE DATA LIKELY TO BE COLLECTED BY SIVAN INNOVATION and SIVAN FRANCE?

1. Data collection methods

a. **Software and web applications developed by SIVAN INNOVATION and SIVAN FRANCE enabling medical monitoring of cancer (MOOV CARE®).**

Your email addresses and phone numbers are used to authenticate you within the application. This information is also used to notify you in case of an emergency related to the medical device or the protection of your data.

In MOOV CARE®, this data is also used to organize communication between a healthcare professional and a patient. Login details are strictly personal and confidential (including the password).

The patient's administrative data is also collected by the physician for the medical record. At a minimum, this includes: last name, first name, date of birth, gender, and the condition for which the web application was prescribed. Communication settings, such as the choice of a day and time for sending automated questionnaires, can be configured. Optionally, the patient's treatment and dosage, the stage of the illness, postal address, and a landline phone number in case of connection problems, as well as the contact information of a relative, if applicable, to ensure support with follow-up care, provided that relative consents. The patient can choose to add a photograph to their interface. This photograph will only be visible to the medical team and the patient. Each questionnaire submission is recorded and appears on the healthcare team's dashboard (date and content). Responses to the questionnaires are analyzed by algorithms that may or may not generate alerts for the healthcare team.

MOOV CARE® Billing: To ensure direct billing, SIVAN France retrieves the following information from the application: the patient's social security number, last name, first name, date of birth, and the follow-up period in order to generate the treatment form. The prescription, if uploaded to the application, and the prescription date are also retrieved for electronic transmission. If necessary, the patient's phone number or email address may be used to obtain the information required for accurate billing.

When a web application is used in a clinical trial, the patient's first and last name are not collected and are replaced by a pseudonym (randomization number). Authentication and communication between the The healthcare professional and the patient are only established via an email address.

b. **Service associated with the use of MOOV CARE®.**

To provide professional and technical assistance to the patient during registration and, if desired, during product use, specific consent is obtained during patient



registration or within the application, activated directly by the patient. A nurse can then contact the patient to assist with registration or daily monitoring. The consent given allows the nurse to access the patient's name, surname, and telephone number for the duration desired by the patient.

The collection of personal data (email address and/or telephone number) also occurs when users contact SIVAN technical support, for the purpose of gathering complaints or resolving technical issues. This service is available to healthcare professionals using the software and to patients monitored through the application. Both email requests and telephone conversations are recorded in SIVAN's legitimate interest and for regulatory purposes. As a patient, you are informed of this and consent to it with each telephone connection.

When implementing this type of software or web application within a healthcare facility, professional users are informed about its operation and functionalities, tailored to their user profiles. Attendance sheets and questionnaires are retained for regulatory purposes and to improve the content of this type of training, in accordance with applicable regulations.

c. **Data collection and processing in the context of the use of mobile applications, such as for screening for tobacco-related diseases and for providing information to the general public.**

Your email addresses or phone numbers are used to authenticate you. This information is also used to notify you in case of an emergency related to the medical device or the protection of your data.

Personal data is collected via mobile applications, downloadable from app stores. A mobile application like SMOKECHECK® collects personal health information to determine a smoker's risk profile and inform them about clinical symptoms that should alert them and prompt them to consult their doctor.

d. **Others**

In the course of our other professional relationships, you may provide us with your personal data through other means, including on our websites, when using our applications, when you post comments on our social media pages, when you make any contact with SIVAN INNOVATION or SIVAN France or when you transmit your personal data to us in any other way.



2. Purposes of processing and legal basis

APPLICATIONS ET WEB-APPLICATIONS

As a patient user Your data is used exclusively with your consent for the following purposes:

- Use of software and applications;
- Managing your requests and/or complaints when you contact technical support;
- Professional and technical assistance when you are contacted by SIVAN
- Conducting clinical trials where appropriate;
- The data produced during the implementation of the applications, after anonymization, is used for studies, research and development, or statistical purposes, for the own needs of SIVAN INNOVATION or its partners, or at the request of national or international health authorities. This is the case, for example, when we use the data for post-market surveillance statistics as required by medical device regulations.
- to measure your satisfaction for statistical purposes, in order to assess your satisfaction and improve our medical devices and/or our communication.

As healthcare personnel Your data is primarily used for the purposes of using software and applications, technical support, statistical studies, satisfaction studies, commercial management, and managing your requests and/or complaints.

As a user of mobile applications like SMOKECHECK® Your health data is used exclusively for the provision of the service offered by the application, with your explicit consent (as indicated by SMOKECHECK®). Information on symptoms and self-testing is provided. Demographic data is collected for statistical purposes. An identifier (phone number and/or email address) is collected to authenticate you and ensure that the person downloading the application is indeed the owner.

As a visitor to our websites You may be asked to provide us with your contact information if you wish to contact us (name, telephone number, email address, message), or subscribe to our newsletter (email).

Apart from cases where your consent has been obtained (use of our applications for the purpose of medical), the processing of your personal data for the various purposes mentioned above is particularly necessary:

- To ensure the proper functioning of applications and software (secure identification and management of your accounts),
- To comply with a legal obligation (traceability of the use of medical devices, for example),
- To arrange reimbursement with the Health Insurance
- To respond to your requests for technical support and/or complaints,
- For the management of our business relationship,
- To ensure the recruitment of our teams, please contact us via the contact form.



- To offer you new services or products, to invite you to a conference, as part of a supplier-customer or prospect relationship approach.

5 HOW LONG IS YOUR DATA KEPT?

SIVAN INNOVATION and SIVAN France are committed to retaining or having your personal data retained for no longer than is necessary for the purposes for which it is processed. Furthermore, SIVAN INNOVATION and SIVAN France retain or have your personal data retained in accordance with the retention periods required by applicable laws.

These retention periods are defined according to the processing purposes implemented by SIVAN INNOVATION and SIVAN France and take into account, in particular, applicable legal provisions imposing a specific retention period for certain categories of data, any applicable statutes of limitations, as well as the recommendations of the CNIL (French Data Protection Authority) concerning certain categories of data processing (for example, Deliberation No. 2016-264 of July 21, 2016, amending a simplified standard concerning automated processing of personal data relating to the management of customers and prospects (NS-048), retention of cookies for 13 months as recommended by the CNIL, retention of regulatory traceability for medical devices extended to 10 years, etc.). When a MOOVCARE® account is closed, the data is archived for 10 years with our HDS-certified hosting provider before being anonymized, unless otherwise requested by the healthcare facility, the data controller (end of contract). An account on SMOKECHECK® is considered inactive 13 months after the last use (completion of a questionnaire), then archived for 10 years, before being anonymized.

6 WHO IS LIKELY TO HAVE ACCESS TO YOUR PERSONAL DATA?

1. Recipients of your data

In the context of using MOOVCARE® Lung

The recipient of patients' personal health data is solely the healthcare team. Data for organizing communication is shared with authorized personnel of SIVAN INNOVATION and SIVAN France, their partners, or their ancillary service providers, as part of fulfilling all or part of the services described above.

SIVAN France is the recipient of the data used to bill for the device (social security number, date of birth, birth order if applicable, personal data from the prescription, prescription date). This data is transmitted to the health insurance provider through a third-party service provider to arrange reimbursement for the health product.

In the context of using software and web applications under clinical investigation The clinical research team (investigators, clinical research associates) receives the clinical data. The study sponsor also has limited access and only in pseudonymized form.

Within the SMOKECHECK mobile application® SIVAN INNOVATION and SIVAN France are



the recipients of your data. However, this data is used solely for research and statistical purposes, and is pseudonymized before being aggregated. At no time is it shared in its raw form with any third party.

The certified health hosting provider used to host all personal data obtained through the use of software and applications available on the French market (MOOV CARE® such as SMOKECHECK®) is the company AVENIR TELEMATIQUE SA (ATE), with a capital of €60,000 whose registered office is located at 21 avenue de la Créativité, 59650 VILLENEUVE D'ASCQ, and registered with the Trade and Companies Register of LILLE MÉTROPOLE under number 347 607 764.

Tel.: (+33)09 78 07 20 78

Mail : contact@ate.info

Legal representative: Mr. Maxence ROUSSEAU, President

The data collected as part of technical support This information is intended for authorized personnel at SIVAN INNOVATION and SIVAN France. It is stored on our telephone operator's servers outside Europe and on our CRM servers located in Europe. The personal data of patients who have consented to professional support is viewed by authorized nursing staff at SIVAN France.

Data collected on SIVAN INNOVATION websites, are likely to be communicated to authorized personnel of SIVAN INNOVATION and SIVAN France, to their partners or their ancillary service providers, in the context of the performance of all or part of the services referred to above.

2. Data transfers outside the European Union

The technical support service offered by SIVAN INNOVATION and SIVAN France, as well as the development, operation, sales and marketing services, can be established outside the European Union, in Israel, at SIVAN INNOVATION Ltd. Israel is recognized by the European Union as a country with an adequate level of protection.

The transfer of this data is carried out to ensure the execution of applications and software (secure identification and management of health establishment accounts), to comply with a legal obligation (traceability of the use of medical devices at the manufacturer), to respond to your requests for technical support and/or complaints, for the management of the commercial relationship, to ensure the recruitment of teams if you contact us via the contact form on the institutional website, to offer you new services or products, to invite you to a conference, in a supplier-customer or prospect relationship approach.

Some of our website and telephone service providers may also be based outside the European Union. In such cases, we strive to ensure that binding data protection and security measures are in place, such as standard contractual clauses or the use of Binding Corporate Rules (BCRs).



7 HOW TO EXERCISE YOUR RIGHTS?

In accordance with applicable regulations on the protection of personal data, you may, at any time, exercise your rights of access, rectification, erasure or portability of data concerning you, as well as your rights to limit and object to the processing of your personal data.

Within the express framework of clinical studies, these rights of limitation and objection will only apply to data from the moment you have exercised them and correspond to a withdrawal of consent to the use of the application.

As a MOOV CARE® patient user, you can exercise your right to withdraw consent at any time. Withdrawing your consent to MOOV CARE® will automatically stop you from receiving health questionnaires, whether or not you are enrolled in a clinical trial. Healthcare professionals will be notified and may then contact you to arrange a new follow-up.

You can also withdraw your consent from the MOOV CARE® application so that the SIVAN nurse providing professional assistance can no longer view your contact details by unchecking your consent in the “settings” section.

If you had consented to participate in a survey conducted by SIVAN INNOVATION and SIVAN France and you no longer wish your data to be used, you can then contact our DPO to exercise your rights over this data (address below).

As a user of mobile applications like SMOKECHECK® You can exercise your right to withdraw consent at any time by contacting our DPO at the address cited below.

If you are subscribed to our newsletters, you can unsubscribe at any time by clicking on the “unsubscribe” link at the bottom of the email received or on the newsletter itself.

In addition, you have the legal right to define guidelines regarding the fate of your personal data after your death.

These rights can be exercised by mail to the following address:

SIVAN France

Data Protection Officer

163 Quai Aulagnier,

F-92600 Asnières-sur-Seine

France

Email : dpo@sivan-innovation.com

In this context, we kindly ask you to accompany your request with the necessary information for your identification (name, surname, email) as well as any other information necessary to confirm your identity.

Specifically for patients using the web applications, SIVAN INNOVATION and SIVAN France, not being data controllers but processors, may exercise these rights directly with the referring physician or the data protection officer of the healthcare center, if applicable, or with the health data hosting provider, or with the sponsor of the clinical trial, if applicable. By using the web applications and software as a patient, you have also been informed that, after anonymization of the health data produced during the implementation of the web applications using a process compliant with applicable data protection regulations, SIVAN INNOVATION may use the data for studies, research and development, or statistical purposes, for its own needs or those of partners, or at the request of national or international



health authorities.

You also have the right to lodge a complaint with the National Commission for Information Technology and Civil Liberties in the event of a violation of applicable regulations concerning the protection of Personal Data, and in particular the Regulation:

Site internet : <https://www.cnil.fr/>
Telephone: 01 53 73 22 22 Postal
address:

CNIL

3 Place de Fontenoy
TSA 80715
75334 PARIS CEDEX 07

You also have the right to object to the processing of your personal data for marketing purposes. Where required by law, your data will only be used for electronic marketing after we have obtained your explicit consent. The collection of certain personal data is essential to enable access to certain services (such as technical support for software and applications) or features (including the use of web applications). You can, of course, exercise your right to object to the collection and processing of this data, but this may prevent you from accessing these services.

8 USER-FRIENDLY SERVICES FROM SIVAN INNOVATION AND SIVAN FRANCE ONLINE, ON SOCIAL MEDIA AND ON YOUR MOBILE DEVICES

SIVAN INNOVATION and SIVAN France strive to continuously improve their electronic services in order to facilitate access for visitors to these websites.

1. COOKIES

MOOV CARE®: The system is available in different versions depending on the country. A functional cookie will automatically direct you to the correct country after your first connection using the same device and browser. A cookie is a text file stored on your device by the server.

In order to improve the quality of services offered on institutional and promotional websites and their suitability to your expectations, SIVAN INNOVATION may use "cookies", text files used to identify your terminal when you connect to one of our services.

The placement of cookies or trackers on your device (computer, tablet, smartphone, etc.) allows SIVAN INNOVATION to collect information and personal data. Depending on your device settings, cookies allow, in particular:

- to use the main features of the SIVAN INNOVATION website,
- to optimize this website and detect any potential technical problems,
- to compile statistics for the purposes of managing traffic and the use of the various elements comprising the SIVAN INNOVATION website (sections visited, user



journeys) in order to improve the website's usability,

- to share information on social networks (LinkedIn, Twitter, Facebook). SIVAN INNOVATION invites you to consult the privacy policies of these social networks to learn about the purposes for which they use your data, particularly for advertising, and the browsing information they may collect:

LinkedIn: <https://www.linkedin.com/legal/cookie-policy>

Twitter: <https://help.twitter.com/en/rules-and-policies/twitter-cookies>

Facebook: <https://fr-fr.facebook.com/policies/cookies/>

These protection policies should, in particular, allow you to exercise your choice with these social networks, notably by configuring your user accounts for each of these networks.

As part of SIVAN's website navigation statistics (to understand the most visited pages, user navigation patterns, time spent on each page, etc.), your IP address may be collected or you may be identified via a unique number. We then use a third-party company (Google) to analyze this data, which has its own privacy policy available for review.

here: <https://policies.google.com/privacy?hl=en>

And <https://support.google.com/analytics/answer/6004245>. These third-party cookies allow Google to recognize your computer both when you visit SIVAN websites and when you visit other websites. Since Google is a company whose parent company is based in the USA, the data collected may be transferred to that country. This data transfer is governed by safeguards covered by standard contractual clauses and takes place in data centers that meet the requirements of security standards such as ISO 27018 and 27701.

SIVAN INNOVATION and SIVAN France can store the analyzed data in the form of statistical reports.

A functional cookie related to pop-ups used on websites is set. This cookie allows us to record your click when you close the pop-up so that it is not displayed again on your next visit. The various cookies set by SIVAN INNOVATION have a maximum lifespan of 13 months.

Depending on your cookie settings, some trackers may be issued or read by third parties (advertising providers, communication agencies, etc.) when you browse SIVAN INNOVATION websites.

You can adjust your cookie settings at any time. By default, cookies are installed on your computer, smartphone, or tablet, but you can easily and freely choose whether or not to allow cookies to be stored on your computer through your browser settings, as described below:

For Microsoft Internet Explorer:

Select the "Tools" menu, then "Internet Options".

Click on the "Privacy" tab > "Settings" > "Advanced". Select the desired level using the slider.

For Mozilla Firefox :

Select the "Preferences" menu > "Tools/Options/Privacy History" Click on the "Privacy" option

"Cookies" section for

Chrome and Safari:

Select the "Edit" menu / "Chrome" / "Safari" > "Preferences" Click on the



"Privacy and security" option / "Privacy" Section "Cookies"

For more information regarding the use of cookies, you can consult the CNIL website: www.cnil.fr.

2. TAGS

Cookies are not the only way to recognize or track visitors on a website. We may use other similar technologies from time to time, such as web beacons (sometimes referred to as "tracking pixels" or "clear GIFs"). These are tiny graphic files that contain a unique identifier that allows us to recognize when someone has visited a website. This can be used by third parties, particularly when you click on social media icons (see their respective cookie policies above).

9 COMPUTER SECURITY

Ensuring the security and confidentiality of the personal data you entrust to us is central to the activities of SIVAN INNOVATION and SIVAN France. We therefore implement all appropriate technical and organizational measures, considering the nature, scope, and context of the personal data you provide and the risks associated with its processing, to protect the security of your personal data and, in particular, to prevent any accidental or unlawful destruction, loss, alteration, disclosure, intrusion, or unauthorized access to this data. These safeguards are applied from the design stage of our data collection processes. Measures are thus implemented both in our capacity as data controller and data processor:

- Data hosting for mobile applications, web applications, and software collecting health data is provided by a health data hosting provider certified by a certifying body for the hosting of personal health data collected through applications provided by its clients and used for medical monitoring purposes. This service includes a feature allowing direct patient access to the hosted applications.
- Password policy: authentication with single access requiring a username and a "strong" multi-character personal password, with regular verification of leaked login data lists.
- A confidentiality clause is in place for employees of SIVAN INNOVATION and SIVAN France.
- Protecting workstations and servers by implementing antivirus software, installing firewalls, etc.
- Measures to guarantee confidentiality: physical access control to SIVAN INNOVATION and SIVAN France premises. Strict access control measures are also in place at our certified health data hosting provider (ISO 27001:2013 Information Security Management Systems - for hosting health data) and our ISO 27001:2013 certified subcontractors. These measures include logical data access controls, data separation instructions, and pseudonymization using hash value processes.
- Measures to guarantee data integrity, particularly during data transfers (data transmission via secure data networks (HTTPS), data confidentiality and integrity (encryption of data streams and strong authentication during connections), ISO 27001:2013 certified hosting provider



- Measures to guarantee the availability and capacity of applications. These include security controls (to ensure that personal data is protected against accidental loss or destruction. These measures are implemented both at the certified healthcare hosting provider and at our main suppliers) and for a rapid recovery of data availability and accessibility in the event of a physical or technical incident (particularly by relying on the certifications of our suppliers).
- Implementation of measures concerning the regular assessment of data processing security (Data protection management procedures and in the event of a data breach, carrying out risk analyses to assess the performance and security of applications and software considered as medical devices, (according to ISO 14971:2019), carrying out PIAs when necessary via CNIL PIA v2.0 tool)

The security and confidentiality of personal data depend on everyone following best practices. Therefore, we urge you not to share your passwords with third parties, to always log out of your profile, and to close your browser window after each session, especially if you are using a computer shared with others. This will prevent other users from accessing your personal information.

We strongly advise against distributing to third parties or publishing on social networks any document issued by SIVAN INNOVATION or SIVAN France containing your personal data.

Finally, SIVAN INNOVATION and SIVAN France have put in place a security breach management procedure to effectively address any potential personal data breaches, to notify the competent authorities of these breaches without delay, and to warn you when this breach is likely to affect your personal data.

10 CONTACT

For any further questions relating to this policy or how SIVAN INNOVATION and SIVAN France process your personal data, please contact our data protection officer at the following address: dpo@sivan-innovation.com.

11 MODIFICATIONS

SIVAN INNOVATION and SIVAN France reserve the right to amend this personal data protection policy; you are encouraged to review it regularly. SIVAN INNOVATION and SIVAN France are committed to informing you of any changes. In additional information will be provided in the event of significant changes. They will also endeavor to indicate what impacts these changes will entail.

Date of publication of the privacy policy: May 2026

This document was approved prior to its distribution by the data protection officer of SIVAN INNOVATION and SIVAN France. It is reviewed at least annually.

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