

## DATA PRIVACY POLICY

### I. Preamble

- 1.1. This Policy is an integral part of the GTCS (as defined hereafter), so the definitions used in the latter are reused in this Policy.
- 1.2. This Policy aims to inform Internet users and/or Users about how their Personal Data are collected from the Site and/or when they use the Products and associated Services, and how Synapse Medicine processes it, as a Controller and/or as a Processor, and finally the rights that Users and Internet users have with respect to such processing as defined hereunder.

### II. Definitions

- 1.1. The following terms, whether used in the singular or plural in this Policy, shall have the following definitions:

<b>Intermediate Archiving:</b>	refers to moving Personal Data that is still of administrative interest to Synapse Medicine (e.g. in the event of litigation and/or a legal obligation) to a separate, logically or physically separate database, and to which access is restricted in any event. This archive is an intermediate step before the Personal Data concerned is deleted or anonymised;
<b>Policy:</b>	refers to this privacy and data protection policy for Users and/or Internet users implemented by Synapse Medicine;
<b>GTCS:</b>	refers to the General Terms and Conditions of Service available on Synapse Medicine's website;
<b>Account:</b>	refers to the User's personal account which provides access to the Products;
<b>Data or Personal Data:</b>	refers to the personal data of the Data Subject, as defined in Personal Data Regulations, collected and processed by Synapse Medicine as a Controller and/or processed by Synapse Medicine as a Processor in connection with the use of the Site, Products and related Services;
<b>Specific Rights:</b>	refers to the rights granted to Users and/or Internet users by Personal Data Regulations concerning the processing of their Personal Data and elaborated on in article 8 of the Policy;
<b>Internet user:</b>	refers to a natural or legal person, including a Healthcare Professional, aged 15 years or over (or under 15 and with the consent of their parent or legal guardian for the processing of their Personal Data set out in the Policy), browsing the Website and for whom this Policy governs Synapse Medicine's processing of their Personal Data;

<b>Data Subject</b>	refers indiscriminately to the Internet user and/or the User and/or the Patient, for example a member of their household, on behalf of whom the User guarantees to have obtained their consent to the processing of their Personal Data;
<b>Patient</b>	refers to any natural person (excluding Users and Internet users) aged at least 15 years (or under 15 years and with the consent of the holder of parental authority) who uses or is mentioned in the Products for purposes that do not fall within the scope of his or her commercial, industrial, craft or liberal activity, including on behalf of a natural person, for example his or her household, and for which the Patient guarantees to have obtained his or her consent.
<b>Products</b>	Refers to the digital SaaS platforms, Widgets and/or mobiles applications (Goodmed) made available to healthcare professionals, patients or commercial partners allowing them to use all or part of the Services;
<b>Partners</b>	Refers to the publishers of applications and/or websites with which Synapse Medicine has entered into an agreement and which allow the customers of said partners, as well as Users as needed, to benefit from certain Services via these applications and/or websites, particularly prescription aid;
<b>Healthcare Professional</b>	refers to the natural person, including one acting on behalf of a legal entity operating in the field of healthcare, who is authorised to access and use the Synapse Platform and the Services as set forth in the GTCS, in particular for the purpose of processing the Data of Data Subjects;
<b>Personal Data Regulations:</b>	refers to Law no. 78-17 of 6 January 1978 on Data Processing, Data Files and Individual Liberties (the French Data Protection Act), in application of the EU Regulation of 27 April 2016 published in the Official Journal of the European Union on 4 May 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (known as the “GDPR”, short for the General Data Protection Regulation);
<b>Controller:</b>	refers to the natural or legal person, public authority, department or other organisation that, alone or jointly with others, determines the processing's purposes and means;

<b>Services:</b>	refers to the service(s) Synapse Medicine offers to Users, via the Platforms, free of charge and/or for a fee,
<b>Site:</b>	refers to the website accessible at the following URL: <a href="https://synapse-medicine.com/">https://synapse-medicine.com/</a> ;
<b>Processor:</b>	refers to the natural or legal person, public authority, department or other organisation that processes personal data on behalf of the controller. Synapse Medicine acts as a Processor as part of the Pro Service for doctors, specifically for the Medication Reconciliation Support Service;
<b>Terminal(s):</b>	refers to the hardware (computer, tablet, smartphone, telephone, etc.) the User and/or the Internet user uses to consult or view the Site and/or the Products.
<b>User</b>	refers to the Internet user who has accepted the GTCS and accesses the Products to use the Services;
<b>Widget(s)</b>	refers to interface elements made up of one or more technological modules presenting different functionalities made available by Synapse Medicine, which can be integrated directly into healthcare solutions and software developed by publishers. Some of these Widgets qualify as "Medical Devices" under Regulation (EU) 2017/745.

### III. The legal basis of the processing

- 2.1. In accordance with Personal Data Regulations, the processing designated in this Policy is subject to a specific legal basis.
- 2.2. The Data Subject has consented to the processing of their Personal Data for one or more specific purposes
  - 2.2.1. The Site has requested the User and/or the Internet user's express consent in order to carry out specific processing, which was explained when it obtained their consent. In accordance with the French Data Protection Authority's (CNIL) recommendations on the subject, customers only receive marketing e-mails after they have been informed that their e-mail address may be used for marketing purposes and how they can easily object to this free of charge, when their e-mail address was collected.
- 2.3. Processing is necessary for the performance of a contract to which the User is party or for the performance of pre-contractual measures taken at the request of the User
  - 2.3.1. In order to use the Products and benefit from the Services, the User has accepted the GTCS *at the very least*. These documents formalise a contractual relationship between the User and Synapse Medicine, serving in particular as the legal basis for Synapse Medicine's collection and processing of the Data Subject's Personal Data.
  - 2.3.2. These Data are necessary for a number of processing operations related to the performance of the contractual relationship between the User and Synapse Medicine, the purposes of which are detailed in Section 4 – Purposes of processing.

2.4. Processing is necessary to comply with a legal obligation to which Synapse Medicine is subject

2.4.1. The processing of Personal Data may also be necessary to comply with a legal obligation to which Synapse Medicine may be subject, for example, the retention of the Site's access logs, in accordance with Decree no. 2011-219 of 25 February 2011 on the retention and disclosure of data identifying any person who has contributed to the creation of content posted online.

2.4.2. Compliance with the legal obligations imposed on Synapse Medicine by the health vigilance systems provided for in the French Public Health Code, among others, may also be used as a legal basis for processing Personal Data under the Medication Shield Service.

2.5. Processing is necessary for the purposes of the legitimate interests pursued by Synapse Medicine or a third party, unless the interests or fundamental rights and freedoms of the Data Subject that require their personal data to be protected prevail, in particular where the Internet User is a child.

2.5.1. Synapse Medicine may have a legitimate interest that justifies the processing of a Data Subject's Personal Data, such as processing why the Data Subject contacted them.

2.5.2. In this case, Synapse Medicine ensures that the processing is necessary to pursue its legitimate interest and assesses the impact of the processing on the Data Subject, taking into account, among other things, the nature of the Data processed and the manner in which it is processed.

2.5.3. Synapse Medicine ensures that it does not disregard the interest or fundamental rights and freedoms by allowing the Data Subject, at any time, to object to all or part of the processing described in this Policy, as well as to exercise their Specific Rights, under the conditions set forth in paragraph 9 – Exercise of Specific Rights of Internet Users.

#### **IV. Processing of Personal Data**

##### **A. Purposes of processing for which Synapse Medicine acts as Controller**

3.1. When they access the Site and/or the Products for Users, the Data Subject is informed that their Personal Data needs to be collected and processed:

- to measure the audience of the Site and/or the Products;
- to preserve evidence in the event of litigation related to the use of the Site and/or the Products, if applicable;
- to send to the informative “newsletter” e-mails to the Data Subject who would have subscribed to it;
- to manage requests to exercise Specific Rights under the conditions of paragraph 10 – Exercise of Specific Rights of Data Subjects;

###### 3.1.1. concerning the GoodMed mobile application for the general public :

- to sign up on the Site and the manage accesses, in particular the Patient's Account;
- to send to the informative “newsletter” e-mails to the Patient who would have subscribed to it;
- to provide Patient Services;
- to improve the Patient Services provided through GoodMed and the Site;
- to send the Patient a reminder and important information about their treatments in the event that Synapse Medicine detects a contraindication on the Patient's prescription;
- to manage and monitor customer relations (confirming registrations, drawing up service contracts, managing complaints and information requests from GoodMed patients, technical support);
- if the Patient has subscribed to the paid version of GoodMed, to bill the monthly subscription fees;
- to comply with its legal obligations, in particular with the health vigilance measures provided for in the French Public Health Code;
- to prevent and detect fraud associated with an attempted transaction in the event of a subscription to the paid Patient Service;

##### **B. Purposes of processing for which Synapse Medicine acts as a processor**

3.2. In the context of the Synapse Platform for Healthcare Professionals, in particular assistance with medication reconciliation and in the context of the use of Widgets integrated into the Software of Healthcare Professionals, we hereby inform the Data Subject their Personal Data needs to be processed on behalf of the Healthcare Professional:

- for the Healthcare Professional to manage the Patient's clinical profile;

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- for the creation of a pseudonymized Patient file;
- to allow the Healthcare Professional to analyse medical prescriptions using text or photo recognition for the prescription, so that the list of prescribed drugs can be imported into the Healthcare's prescription assistance software;
- for the Healthcare Professional to provide the results of medication reconciliation analyses and monitor indicators related to reconciliation;
- to create a space for discussion between Healthcare Professionals;
- to send the Healthcare Professional User contraindication and vigilance alerts linked to the Patient's profile in relation to a prescription for this Patient;

3.3. In the context of the Synapse Platform for Healthcare Professionals, in particular assistance with medication reconciliation and in the context of the use of Widgets integrated into the Software of Healthcare Professionals, we hereby inform the Healthcare professional their Personal Data needs to be processed on behalf of the Healthcare Professional:

- to sign up on the Site and manage accesses, in particular the Account;
- to customise Synapse Medicine's communications to Healthcare Professionals, including informative e-mails, based on how they use the Synapse Platform and/or the Site;
- to provide and improve the Services provided by Synapse Medicine through the use of the Products;
- to manage and follow-up on customer relations (confirming registrations, drawing up of service contracts, managing complaints and information requests from the Healthcare Professional, technical support);
- if the Health Professionals have subscribed to the Services, to bill the monthly subscriptions;
- to prevent and detect fraud associated with an attempted transaction in the event of a subscription to the paid Services;

### **C. Storage of Personal Data**

- 3.4. Synapse Medicine implements technical and organisational security measures to ensure the security, integrity and confidentiality of Personal Data, to prevent it from being distorted, damaged or accessed by unauthorised parties:
  - Secure User authentication system;
  - Implementation of an AMI protocol to manage user access;
  - Processing the Data collected according to secure protocols which allow them to manage and process the registration requests they receive and to use the Platforms' features securely (data encryption);
  - Microsoft Azure hosts the Products and User Data in France.
- 3.5. Synapse Medicine ensures there is an appropriate level of security, taking into account the state of the art, implementation costs, and the nature, scope, context and purposes of the processing, as well as the risks and likelihood thereof.
- 3.6. These measures are available on request from Synapse Medicine.

- 3.7. "Sensitive" Data are hosted by an approved host in accordance with the provisions of Article L.111-8 of the French Public Health Code.

#### **D. Synapse Medicine's Collection of Personal Data on the Site and/or through the Platforms**

- 3.8. When Data Subjects browse the Site, Synapse Medicine collects the following Personal Data, which is kept for a period of **one (1) year** in an active database from the last time the Data Subject accessed the Site:
- Connection data (date, time, IP address),
  - Navigation data (pages consulted).
- 3.9. Synapse Medicine collects the following Personal Data when a User creates an Account, which the User provides or communicates spontaneously when they browse and which is kept for a period of **three (3) years** in an active database and then two (2) years in Intermediate Archiving:
- For Healthcare Professionals: surname, first name, specialism, phone number and e-mail address;
  - For the Patients: surname, first name, e-mail address.
- 3.10. As part of the paid Services it provides, Synapse Medicine collects the following Personal Data that the User provides when they pay for purchases and which is kept for a period of **three (3) years** in an active database and then seven (7) years in Intermediate Archiving, in accordance with Synapse Medicine's tax and accounting obligations:
- Billing information,
  - Invoices,
  - Order information,
  - Amount of completed transactions as well as the date and time of the transactions.
- 3.11. In the event of a subscription to the premium Offer, the following Data are also collected and kept for the duration of the transaction and/or until the subscription is terminated and/or the date the last payment is due:
- The identity of the cardholder,
  - Bank card number,
  - Expiration date,
  - Information about the purchase (amount, date, etc.).
- 3.12. When Patients use the Patient Service, Synapse Medicine collects the following Personal Data, which the Patient provides via GoodMed, for a period of **three (3) years** in an active database from the last time the Patient logged in to GoodMed and then two (2) years in Intermediate Archiving:
- Patient health data (prescriptions, question history, clinical profile).

#### **E. Personal Data Processed by Synapse Medicine as a Processor**

- 3.13. Synapse Medicine processes the following Personal Data, which the Healthcare professional provides via the Synapse Platform when they use the Pro Service for doctors, in particular the medication reconciliation service, for a period of **three (3) years** in an active database from the last time the Healthcare Professional logged in to Synapse Platform and two (2) years in Intermediate Archiving:

- For Healthcare Professionals: surname, first name, phone number, e-mail address
- For caregivers: surname, first name, phone number, e-mail address
- For Patients: surname, first name, date of birth, weight, height, address, phone number, patient health data (prescriptions, clinical profile)

#### F. When is Personal Information shared?

Categories of Data recipients	Purpose of the proposed transfer
Technical service providers	To make sure credit card payments, the hosting of collected data and the confidential and secure processing of Data collected in connection with the use of the Services function correctly
Stripe	Payment for Platform Services and fraud management
Prescription Aid Software (PAS) Publisher Partners	Sharing Synapse component user information within PAS with the PAS publisher for billing purposes.
Microsoft Azure	Site and Data hosting
Amplitude Analytics	Site improvement
Mailchimp	Sending newsletters
Partners	Make it possible to use certain Services, including prescription aid.

- 3.14. Only authorised Synapse Medicine employees may, under Synapse Medicine's liability, access Personal Data regarding an adverse health event, within the scope of their respective responsibilities.
- 3.15. In the event Personal Data is transferred to a recipient located in a country outside of the European Union that has not been the subject of an adequacy decision by the European Commission, Synapse Medicine undertakes to take all appropriate safeguards to ensure the lawfulness of the transfer in accordance with Personal Data Regulations.

#### G. What is the privacy policy regarding photos of prescriptions?

- 3.16. Synapse Medicine offers automatic extraction of proprietary medicinal products and active ingredients from prescription photographs to make it easier to analyse complex prescriptions as part of the Services.
- 3.17. Photographs taken with the Platforms' Synapse Medicine assistant are not stored nor shared with third parties. Their use is limited to extraction processing when using the Platforms' Synapse Medicine wizard. No personal information is extracted from these photos. To comply with the protection of the Data of the Data Subject and of the healthcare professional (including, if applicable, the Healthcare Professional) concerned by the prescription and to allow us to improve the tool's performance, Healthcare Professionals and patients who use the Service shall make sure to only photograph the area containing the medications.

#### H. Specific Rights

3.18. In accordance with Personal Data Regulations, the Data Subject may, at any time, benefit from the following Specific Rights of/to :

- Access,
- Rectification,
- Erasure,
- Restriction of processing,
- Portability,
- Object,
- Post-mortem instructions.

3.19. Right of access

3.18.1. The Data Subject shall be able to obtain confirmation from Synapse Medicine as to whether or not Personal Data concerning them is being processed and, when it is, access to such Personal Data and the following information:

- the purposes of the processing;
- the categories of Personal Data;
- the recipients or categories of recipients to whom the Personal Data have been or will be disclosed;
- where possible, the period of time for which Personal Data are to be retained or, where this is not possible, the criteria used to determine this period;
- the existence of the right to request that Synapse Medicine rectify or erase their Personal Data, or to restrict the processing of their Personal Data, or the right to object to such processing;
- the right to lodge a complaint with the supervisory authority for personal data (the French Data Protection Authority [CNIL] in France);
- where Personal Data are not collected from the Data Subject, any available information as to its source;
- the existence of automated decision-making, including profiling, and, at least in such cases, relevant information about the underlying logic and the significance and intended consequences of such processing for the Data Subject;

3.18.2. Where Personal Data are transferred to a third country or to an international organisation, the Data Subject has the right to be informed of the appropriate safeguards with respect to such a transfer.

3.18.3. Synapse Medicine shall provide a copy of the Personal Data being processed.

3.18.4. Synapse Medicine may charge a reasonable fee based on administrative costs for any additional copies requested by the Data Subject or in the event of a request for hard copy and/or a physical version of the Personal Data.

3.18.5. Where the Data Subject submits a request electronically, the information shall be provided in a commonly used electronic format, unless the Data Subject requests otherwise.

3.18.6. The Data Subject's right to obtain a copy of their Personal Data shall not infringe the rights and freedoms of others.

### 3.20. Right to rectification

3.19.1. The Data Subject has the right to have Synapse Medicine rectify any inaccurate Personal Data concerning them without undue delay. They may also have incomplete Personal Data be completed, including by providing an additional declaration.

### 3.21. Right to erasure

3.20.1. The Data Subject has the right to have Synapse Medicine erase the Personal Data concerning them, without undue delay, when one of the following reasons applies:

- The Personal Data are no longer necessary for the purposes for which they were collected or otherwise processed by Synapse Medicine;
- The Data Subject has withdrawn their consent to the processing of their Personal Data and there is no other legal basis for the processing;
- The Data Subject exercises their right to object under the conditions listed hereunder and there is no compelling legitimate reason for the processing;
- The Personal Data has been processed unlawfully;
- The Personal Data must be deleted to comply with a legal obligation;
- The Personal Data was collected from a child.

### 3.22. Right to restriction of processing

3.21.1. The Data Subject can have Synapse Medicine restrict the processing of their Personal Data when one of the following reasons applies:

- Synapse Medicine is verifying the accuracy of the Personal Data after the Data Subject has challenged the accuracy of the Personal Data,
- The processing is unlawful and the Data Subject objects to having the Personal Data erased and instead demands its processing be restricted;
- Synapse Medicine no longer requires the Personal Data for processing reasons, but the Data Subject still needs the Personal Data to establish, exercise or defend legal rights;
- The Data Subject has objected to the processing as described hereunder, and Synapse Medicine verifies whether the legitimate reasons for the processing prevail over the alleged reasons.

### 3.23. Right to data portability

3.22.1. The Data Subject can receive the Personal Data concerning them from Synapse Medicine in a structured, commonly used and machine-readable format when:

- The processing of Personal Data is based on consent; and
- The processing is carried out using automated processes.
- When the Data Subject exercises their right to data portability, they have the right to have Synapse Medicine send the Personal Data directly to another controller, which they shall designate where technically possible.
- The right to data portability of the Data Subject's Personal Data shall not infringe the rights and freedoms of others.

### 3.24. Right to object

3.23.1. The Data Subject may object at any time, on grounds relating to their specific situation, to the processing of the Personal Data concerning them based on Synapse Medicine's legitimate interest. Synapse Medicine will then no longer process the Personal Data, unless it can demonstrate that there are compelling legitimate grounds for the processing that override the interests, rights and freedoms of the Data Subject, or may retain them to establish, exercise or defend legal rights.

3.23.2. The Data Subject may object to being sent marketing offers, at any time. According to the terms and conditions provided for in Article N of this Policy or by clicking on the link provided for this purpose in the last marketing offer sent via e-mail.

### 3.25. *Post-mortem* instructions

3.24.1. The Data Subject can provide Synapse Medicine with instructions regarding the retention, deletion, and sharing of their Personal Data after their death. These instructions may also be registered with a "certified and trusted digital third party". These instructions, i.e. a kind of "digital will", can designate a person in charge of performing them; failing that, they shall designate the heirs of the Data Subject.

3.24.2. In the absence of any instructions, the heirs of the Data Subject may contact Synapse Medicine in order to:

- access the processing operations performed on the Personal Data to "organise and settle the estate of the deceased";
- be sent "digital assets" or "data resembling family memories, which can be passed down to heirs";
- have the User's Account on the Site closed and to object to the continued processing of their Personal Data.

3.24.3. In any event, the Data Subject may inform Synapse Medicine, at any time, that they do not want their Personal Information to be disclosed to a third party in the event of their death.

## I. Contact information

3.26. These Specific Rights can be exercised at any time by contacting Synapse Medicine:

- By e-mail to [dpo@synapse-medicine.com](mailto:dpo@synapse-medicine.com)
- by a letter addressed to the following postal address: 17 rue Vauban, Synapse Medicine, 33000 Bordeaux (include the wording “*Vie Privée Protection des Données*”), or by e-mail to [contact@synapse-medicine.com](mailto:contact@synapse-medicine.com).

## **J. Changes to the Privacy Policy**

- 3.27. Synapse Medicine may amend the Policy at any time.
- 3.28. Where applicable, the page with the Privacy Policy published on the Site will be updated and Users will be informed by e-mail when there is a change.

## **V. Cookie Usage Policy**


### **A. What is a cookie?**


- 5.1. A cookie is a text file that may be stored on the Terminal when consulting an online service with a browser. While it is valid, a cookie file allows its issuer to recognise the Terminal concerned each time this Terminal accesses digital content containing cookies from the same issuer, among other things. In any case, the browsing cookies stored on the Data Subject's Terminal with their consent are destroyed eleven (11) months after they are stored on said Terminal.

### **B. What are the cookies issued on the Site and/or the Products used for?**

- 5.2. The Personal Data collected from cookies issued by Synapse Medicine or third parties makes it possible to:
- establish statistics and traffic and usage volumes for the various elements composing the Site (sections and content visited, clickstream) and/or the Platforms, which allow Synapse Medicine to improve the Site and/or the Platforms' utility and ergonomics and, if necessary, that of its products and services, in particular the Services;
  - adapt how the Site and/or the Platforms are presented to fit the display preferences of the Data Subject's Terminal (language used, display resolution, operating system used, etc.) when they visit the Site and/or the Platforms, according to the hardware and the display or reading software on their Terminal;
  - memorise information relating to a form that the Data Subject has filled out on the Site and/or Platforms (registration or access to the Account) or to products, services, including the Services, or information that the Data Subject has selected on the Site and/or Platforms (subscribed service, contents of an order basket, etc.);
  - provide the Data Subject with access to reserved and personal areas of the Site and/or Platforms, such as their Account, thanks to usernames or data that they may have previously provided and to implement security measures, for example when they are asked to log in again to content or a service after a certain period of time.

### **C. Cookies and objecting to cookies**

- 5.3. When they first visit the Site, a banner informs the Data Subject of the presence of the cookies referred to in article C of this document and then they can choose whether or not to consent to cookies.
- 5.4. Information on cookies is collected and processed by Synapse Medicine, you can click here  to view the purposes and the length of time they are kept.
- 5.5. Cookies are only stored if the Data Subject consents.

5.6. The Data Subject can learn about and configure cookies at any time by placing their cursor on the small logo  at the bottom of each page of the Site and Products.

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