

## OSIMIS PRIVACY POLICY

### 1. WHAT DO WE DO WITH YOUR PERSONAL DATA?

- 1.1 OSIMIS, a company with limited liability organised under Belgian law, with statutory seat located at Rue du Bois St-Jean 15/1, 4102 Seraing and registered with the Crossroads Bank for Enterprises under number 637.982.658 (“**Osimis**”, “**we**”, “**our**”, “**us**”) processes personal data related to the (former) visitors of its websites (e.g. <http://www.osimis.io/en/>), the (former) (prospective) representatives of its customers, the (former) representatives of its suppliers, potential recruits and other data subjects (the “**data subject**”, “**you**”, “**your**”).
- 1.2 This Privacy Policy (the “**Policy**”) applies to the processing by Osimis of your personal data, unless Osimis processes your personal data in the context of your interactions with the Lify patients’ portal (in such as case, the Lify Privacy Policy will apply).

### 2. UNDERTAKING

- 2.1 We undertake to bring our data processing activities into compliance with applicable data protection legislation, including Regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (“**GDPR**”) and the Belgian Data Protection Act of 30 July 2018, each as applicable, and as amended, restated or replaced from time to time (the “**Applicable Data Protection Law**”).

### 3. CATEGORIES OF PERSONAL DATA

- 3.1 We may process the following categories of personal data, in particular for the purposes described hereafter:
  - Your personal identification data (surname, first name, postal address, etc.), processed for preparing quotes related to our products and services and following-up on them (in particular for the installation or activation of our software), for managing customer files or prospect files, for providing our customer support and our IT support and for performing our business development (in particular through commercial fairs and events);
  - Your contact details (phone number, email address, etc.), processed for allowing us to contact you in the course of the provision of our products and services and to confirm an order, an appointment or other transactions;

- Your professional identification data (job function, company address, VAT number, etc.), processed for managing customer files, prospect files and supplier files and to audit our suppliers;
- Data related to your professional life (aptitudes, qualifications, experience, etc.) for recruitment purposes;
- Your electronic identification data (IP address, electronic identifiers, etc.), processed for measuring the audience of our websites and to detect and prevent fraud and information security breaches;
- Data related to your use of our website (the pages viewed, the links you clicked on, the time you stayed on a page, etc.), processed on an aggregated basis solely for the purpose of enhancing the user experience of our websites;
- Photographs representing you, processed mainly in the context of our internal and external company communications (e.g. in case of testimonials published on our websites);
- Video footage of you, only processed in the context of the surveillance of our premises through CCTV and only to the extent permitted by applicable law.

### 3.2 We may also process your personal data:

- To carry out corporate restructuring operations;
- For internal and external audits;
- For the management of disputes with customers, suppliers and other data subjects.

### 3.3 The provision of your personal data may be necessary for:

- The performance of a contract to which you are a party or in order to take pre-contractual steps at your request (e.g. in the context of recruitment);
- Compliance with a legal obligation applicable to us (e.g. with regard to invoicing, fraud detection, surveillance of our premises, taxation, etc.);
- The legitimate interests pursued by us (or by a data recipient) provided that these interests prevail over your fundamental rights and freedoms (e.g. the detection and the prevention of fraud and information security breaches, the conduct of corporate reorganisations, etc.).

### 3.4 In some cases, we will ask for your free, prior and informed consent before processing some of your personal data (e.g. photographs portraying you for company communication purposes, etc.).

### 3.5 We do not subject you to decisions based exclusively on automated processing that produce legal effects concerning you or similarly significantly affect you.

### 3.6 The provision of some of your personal data (e.g. your name, email address, etc.) is a condition to the conclusion with us of the contract with your company (e.g. if you are representing a customer or a supplier).

3.7 The possible consequences of not providing your personal data could include our inability to meet our obligations under a contract (e.g. the customer or supplier contract) or a breach by us of one or more obligations under applicable laws (e.g. accounting or tax laws).

#### **4. SOURCE OF THE DATA**

4.1 We may collect your personal data as follows:

- Directly from you (e.g. through a request for information);
- From actions performed on our websites;
- From the Internet (e.g. as part of our business development or recruiting efforts).

#### **5. RECIPIENTS OF YOUR PERSONAL DATA**

5.1 We may disclose your personal data to the following recipients:

- The customer support team;
- The IT development team;
- Business developers (including agents);
- The managers of Osimis;
- Our legal counsel and/or bar-registered lawyers e.g. in the context of corporate restructuring operations and litigation proceedings;
- Third party service vendors related to the operation and maintenance of our information systems (these vendors only have access to the personal data necessary to carry out their missions);
- Government entities authorised to access and/or obtain your personal data in accordance with applicable law;
- The courts and tribunals of the judicial order in the event of a dispute involving you;
- Law enforcement authorities in the event of a finding or a suspicion of the occurrence of an offence involving you in accordance with or as required by applicable law.

5.2 In the event of corporate reorganisations (e.g. mergers or acquisitions) or fundings, we may transfer certain of your personal data (in a format that prevents such data from being linked back to you) to a third party involved in the transaction (e.g. a buyer or an investor) in accordance with Applicable Data Protection Law.

#### **6. THIRD-PARTY VENDORS**

6.1 We take appropriate measures to ensure that our third-party vendors process your personal data in accordance with Applicable Data Protection Law.

6.2 We also ensure that our own data processors undertake to, among others, process your personal data only on our instructions, not hire subprocessors without our consent, take appropriate technical and organisational measures to ensure an adequate level of security of your personal data, ensure that persons authorised to access your personal data are subject to obligations of confidentiality, return and/or destroy your personal data at the end of their services, comply with audits and assist us in following up on your requests regarding the exercise of your data protection rights.

**7. TRANSFERS OUTSIDE OF THE EUROPEAN ECONOMIC AREA**

7.1 We do not transfer your personal data outside of the European Economic Area, unless we ensure that appropriate safeguards are taken for the transfer to comply with Applicable Data Protection law, such as:

- The country to which the personal data are transferred has benefited from an adequacy decision by the European Commission under Article 45 of the GDPR and the transfer falls within the scope of such adequacy decision; or
- Standard data protection contractual clauses as approved by the European Commission or another competent supervisory authority pursuant to Article 47 of the GDPR have been established; or
- In case of a transfer of personal data to the United States, the transfer complies with the conditions imposed by the EU-US Privacy Shield under Article 45 of the GDPR.

**8. RETENTION**

8.1 We ensure that your personal data are kept for no longer than is necessary for the purposes for which they are processed.

8.2 We use the following criteria to determine the retention periods of personal data according to the context and purposes of each processing operation:

- The end of the commercial relationship with Osimis;
- Security reasons (for example, the security of our information systems);
- Any current or potential dispute or litigation involving you;
- Any legal or regulatory obligation to retain or delete personal data.

**9. YOUR RIGHTS**

9.1 Subject to Applicable Data Protection Law, you have the right to be informed, the rights to access, rectify and erase your personal data, the rights to object to or limit the processing of your personal data, the right to data portability and the right to withdraw consent.

Right	What does it mean?
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<i>The right to be informed</i>	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and how to exercise your rights. This is why we are providing you with the information in this Policy.
<i>The right of access</i>	You have the right to obtain access to your personal data. This is so you are aware and can check that we are using your personal data in accordance with Applicable Data Protection Law.
<i>The right to rectification</i>	You are entitled to have your personal data rectified if they are inaccurate or incomplete.
<i>The right to erasure (the “right to be forgotten”)</i>	You have the right to have your personal data erased. However, the right to erasure (or the “right to be forgotten”) is not absolute and is subject to special conditions. We may retain your personal data to the extent permitted by applicable law, and in particular when their processing remains necessary to comply with a legal obligation to which Osimis is subject or for the establishment, exercise or defence of a legal claim.
<i>The right to object to processing</i>	You have the right to object to certain types of processing (e.g. when the processing is based on our legitimate interests and, taking into account your particular situation, your interests or fundamental rights and freedoms prevail).
<i>The right to restrict processing</i>	You have the right to restrict further use of your personal data (e.g. when Osimis does not need your personal data anymore but your personal data are still necessary for the establishment, exercise or defence of a legal claim).
<i>The right to data portability</i>	You have the right, under certain circumstances, to receive the personal data concerning you and that you have provided to us in a structured and commonly used machine-readable format and to transmit them to another data controller.
<i>The right to withdraw consent</i>	If you have given your consent to the processing by Osimis of certain of your personal data, you have the right to withdraw your consent at any time.

9.2 Please submit requests regarding your rights as a data subject to our Data Protection Officer by email at [GDPR@osimis.io](mailto:GDPR@osimis.io). We will try to comply with your request as soon as reasonably practicable and always under the timeframes set forth by Applicable Data Protection Law. Please note that we may need to retain certain of your personal data for certain purposes as required or authorised by law. Please also note that, if we have doubts about your identity, we may require you to provide us a proof of your identity to prevent unauthorised access to your personal data.

## **10. SECURITY**

- 10.1 We implement adequate technical and organisational measures to ensure a level of security of your personal data that is appropriate to the risks.
- 10.2 We take appropriate measures to ensure that we report security incidents leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

## **11. QUESTIONS AND COMPLAINTS**

- 11.1 If you have any questions or complaints about the way we process your personal data, please send them to our Data Protection Officer by email at [GDPR@osimis.io](mailto:GDPR@osimis.io) or by post at Rue du Bois St-Jean 15/1, 4102 Seraing (Belgium).
- 11.2 You have the right to lodge a complaint at the competent supervisory authority. The supervisory authority for Belgium may be contacted at:

*Data Protection Authority*  
*35 Rue de la Presse / Drukpersstraat, 1000 Brussels*  
*+32 (0)2 274 48 00*  
[contact@apd-gba.be](mailto:contact@apd-gba.be)

## **12. MISCELLANEOUS**

- 12.1 We reserve the right to modify this Policy at any time, so please review it frequently. We will inform you of changes we make to this Policy so that you are at any time aware of the way we process your personal data.
- 12.2 In the event of a conflict or inconsistency between a provision of this Policy and a provision of another policy or other document of Osimis relating to the processing of personal data, the provision contained in the document first appearing in the below list shall prevail over the other:
- The Lify Privacy Policy (only if the Lify Privacy Policy is applicable);
  - This Policy;

- Another policy or document of Osimis relating to the processing of personal data.