



Privacy Statement

This privacy statement does not apply to situations where we have notified you that an alternative privacy statement applies.

Effective date of this privacy statement: **18 Novembre 2024**.

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Boulivan IT Ltd’s mission is to contribute to human welfare by the application of engineering in the research, design, and sale of tools allowing users to simplify their life and, in the case of Diabolus™, help user to stabilized and then extend life expectancy.

Boulivan IT Ltd and Diabolus™ (together, “we” or “Boulivan IT Ltd”) propose solution to take care of your diabetes and more precisely functional insulin therapy, withlink between patients and healthcare professionals.

This privacy statement describes how your personal data, including health-related data, is collected and further processed by Boulivan IT Ltd in connection with your use of Boulivan IT Ltd Diabetes Management Solutions, which rights you have and how to contact us about this privacy statement or to exercise your rights.

If you choose to share your personal data with healthcare professionals in context of your medical treatment or other parties external to Boulivan IT Ltd, they will be solely responsible for their own use, or further processing, of your personal data.

For the purpose of this privacy statement, “you” means any individual that uses Boulivan IT Ltd direct-to consumer Solutions or whose behalf the Solutions are used, as applicable.



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PERSONAL DATA WE OBTAIN

We obtain personal data you directly provide information to us during your registration.

The personal data you provide to us depends on your use of our tools. When contacting Boulivan IT Ltd customer and product support (e.g., by phone, email, chatbot) and/or when registering to the mobile application Diabolus™, some of your personal data is necessary to allow us to provide you with that Solution. In such case, the following types of personal data we obtain include:

- your contact information and/or account details (such as your first and last name, home address, country, phone number, email address, date of birth or age, identification data to your account Diabolus™, which means username and crypted password,
- information about your healthcare provider(s), healthcare organization,
- information relevant to the performance of a contract with us (such as your credit card details (only in relation to any of your orders on an online ordering platform where available in your country), order and shipment information, information about invoices
- Information about your food consumptions and any data necessary for the calculations,
- other personal data contained in content you submit on the Solution(s) (such as your request for technical support).

At the time when the collection of your personal data is necessary, we will inform you whether the provision of the above information is optional or mandatory for us to provide the Solution you requested. Where the collection is mandatory, we may not be able to provide you with the Solution you requested if you choose not to provide that information to us.

In addition, we may obtain health-related data, about your health, associated to your Boulivan IT Ltd therapy, including your type of diabetes, Boulivan IT Ltd device information, such as information from Boulivan IT Ltd diabetes management software (e.g., Diabolus™). We will process health-related data only with your explicit consent or in order to meet Boulivan IT Ltd's legal and regulatory obligations as a manufacturer of medical software, as explained below.

PURPOSES AND LEGAL BASIS FOR PROCESSING

Boulivan IT Ltd will process your personal data (including health-related data) only as relevant to the Solution(s) for which you provided the data and for the specific purposes, and based on the legal grounds, outlined below. Please note that one or more purposes may apply simultaneously, depending on the Solution(s) you have registered for or requested. Please refer to the service description of the Solution(s) for more information on their functionalities.

(Explicit) Consent

- Processing of health-related data

With your explicit consent, we will process your health-related data for the following specific purposes:

- To create your Diabolus™ account in order to upload your device data and to generate your Diabolus™ reports;
- To aggregate health-related data in a way that does not directly identify anyone. We will use this information to create internal reports to further research and develop new products and



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services for Diabetes Management and improve existing products and services, and/or to develop materials presented at conferences and to health care providers and public authorities, enable Boulivan IT Ltd to improve training, education and support programs; or transmit health data, anonymously, to diabetes research centre.

- Where applicable, to enable the linking of your Diabolus™ account with the Diabolus™ account used by your healthcare professional in context of your medical treatment.
- Marketing communications In accordance with the laws applicable in your country, we may also ask you to “opt-in” or consent to receive communications regarding products and services that we believe may be of interest to you including:
 - To receive newsletters;
 - To receive educational material;
 - To receive updates about Boulivan IT Ltd products and service innovation;
 - To participate in surveys.

If at any time you decide not to receive any marketing communication for all or one of the specific topics listed above, you will be given the possibility to opt-out following the procedure provided in any relevant message you receive from us. Alternatively, you can contact us through the mobile app Diabolus™ or through the web site <https://diabolus.eu>.

Legitimate interest

We will also process personal data, based on our legitimate interests to support the following activities or purposes:

- To respond to your requests or queries and provide you with technical support, including technical training, you seek in relation to Boulivan IT Ltd Diabetes Management Solutions;
- To communicate with you and send you (urgent) communications of an operational nature (e.g., planned outages or updates) about our Solutions;
- To send alerts to care partners you have chosen to share with via Diabolus™
- To manage and maintain your personal data associated with the Boulivan IT Ltd Diabetes Management Solution(s) you use;
- To make your personal data (such as your credentials, contact information and/or preferences) available across the Boulivan IT Ltd Diabetes services you use, in order to facilitate and personalize your customer journey with Boulivan IT Ltd, where relevant;
- To provide the product services requested on your behalf by your health care provider where applicable
- To aggregate personal data to a level where you are no longer directly identifiable. Such information is used to create statistics in order to gain a better understanding of the quality and performance of our services;
- To prevent and detect fraud and other criminal activities, and to comply and enforce our policies and the Terms of Use of the relevant Solution(s) as necessary for the establishment, exercise, or defense of our legal rights.



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Contract

Depending on the services available in your country, we will process your personal data as necessary to perform our contractual obligations or to take steps at your request, before entering a contract for the following purposes:

- To process, ship and deliver the product(s) you ordered on our online ordering platform, in relation to your diabetes therapy.
- To negotiate and agree on the contract terms applicable to specific Boulivan IT Ltd Diabetes services, to send you relevant (non-marketing) communications and to perform the essential elements of the services you requested.

Legal obligation

In addition, Boulivan IT Ltd will process personal data (including health-related data) to comply with its legal obligations and as necessary for reasons of public interest in the area of health, including:

- To comply with post-market surveillance and vigilance reporting obligations under applicable medical software regulations;
- To comply with requests from competent authorities;

DATA SHARING

Boulivan IT Ltd may disclose your health data with third parties, such as diabetes research centres, except as described in this privacy statement.

In the ordinary course of business, in form of anonymous data, for confidentiality reasons. In ordinary course of business, we may share your personal data (including personal health-related data) with third-party service providers to perform services on our behalf and only based on our documented instructions, including:

- Postal services, to send documents, related to diabetes Boulivan IT Ltd Services, such as invoices or any other official documents,
- Customer support and communication services, such as to send you marketing communication you have signed up for, as well as urgent (non-marketing) communication about Boulivan IT Ltd products and services,
- Consulting services regarding product and/or service development, security and technical strategy,
- Survey management solutions to manage surveys we may invite you to participate to,
- Legal and professional services to receive legal advice and manage legal disputes, where applicable.

Where our service providers need to have access to your personal data, we will (1) select providers who respect your privacy and comply with applicable data protection laws; (2) only give them access to the information they need to perform their services; (3) ensure that they will only use the information for the purposes agreed in our contract with them and protect that information in accordance with applicable data protection laws.

We may also share your personal data (including health-related data) with our Boulivan IT Ltd affiliates.



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Boulivan IT Ltd maintains appropriate technical and organizational measures designed to protect your personal data against accidental, unlawful or unauthorized destruction, loss, alteration, disclosure, or access.

Your personal data (including health-related data) is stored on servers located in United Kingdom or in the European Economic Area ("EEA") but we may also transfer your information to Boulivan IT Ltd affiliates and/or third party service providers located outside of the EEA as described above, including in North America that has not been recognized by the European Commission as providing an adequate level of data protection.

Where there is a need to transfer your personal data to Boulivan IT Ltd affiliates or to third-party service providers, we will ensure that there are appropriate safeguards in place to protect your personal data as required by applicable laws. When your personal data need to be transferred outside the EEA, United Kingdom or Switzerland, we will implement appropriate safeguards to ensure an adequate level of data protection, including executing data transfers agreements based on the European Commission's Standard Contractual Clauses.

We also reserve the right to transfer personal data we have about you in the event we sell or transfer all or portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use the personal data you have provided to us in a manner consistent with this privacy statement. Following such sale or transfer, you may contact the entity to which we transferred your personal data with any inquiries concerning the processing of that personal information.

DATA RETENTION

Your personal data will only be retained by Boulivan IT Ltd for so long as necessary and relevant to fulfill the purpose(s) set out herein and may be retained beyond the duration of your business relationship with Boulivan IT Ltd if required to enable us to fulfill such purposes as to comply with legal requirements, including compliance and record retention regulations.

YOUR RIGHTS

Subject to applicable laws, you have the following rights with respect to the processing of your personal data as described in this privacy statement:

- to receive access to your personal data;
- to withdraw your consent at any time and without giving reasons, in case our processing of your personal data is based on your consent. However, this will not affect the lawfulness of data that have been processed before you withdrew consent;
- to have any inaccurate or incomplete personal data about you corrected or completed. If you use a device management software or associated service, you may be able to correct your information directly within your account. Alternatively, you can contact us as explained below. Please be informed that we can ask you to demonstrate that the personal data you want to correct is indeed erroneous;



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- to obtain the personal data you provided to us - based on your consent or as needed by us to perform a contract with you - in a way that is accessible and machine-readable and to request us to transfer such data to another organization;
 - to ask for the deletion of your personal data that is being processed or retained by us. Personal data may be retained in exceptional cases exclusively if required to enable us to comply with legal requirements, including compliance and record retention regulations;
 - to restrict the processing of your personal data if and when (a) you contest the accuracy of the data, (b) the processing is illegitimate and you request the restriction of its use instead of its deletion (c) your personal data is no longer needed for the purposes which are outlined above, but you need it in judicial proceedings;
 - to object to the processing of your personal data based on our legitimate interests.

CONTACT

If you wish to exercise any of your rights, obtain a copy of the safeguards implemented by Boulivan IT Ltd, or if you have any questions about the processing of your personal data (including health-related data) in accordance with this privacy statement, you can contact us or our Data Protection Officer at the following e-mail address: contact@boulivanitltd.com. Subject to applicable law, you may lodge a complaint with a data protection authority, in particular in the country of your habitual residence, if you are not satisfied by our response or if you consider your privacy rights have been breached.

UPDATE

This privacy statement will be reviewed and updated periodically to reflect changes to our personal data practices or relevant laws. We will post a notice on the Solutions to notify you of any significant changes and indicate at the top of this privacy statement when it was most recently updated.