

## APPENDIX 5

### PERSONAL DATA POLICY – CUSTOMER'S CLIENTS

Force HT (the "Company") protects its Customer's ("the Clinic") Clients personal integrity through its' high value of confidence originating from each Customer, whilst processing your data. Therefore, the Company believes transparency is an important factor when paying respect to personal integrity, and nonetheless taking it into consideration. Accordingly, the Company has adopted this Personal Data Policy to ensure that the Customer has complete access to the insight needed to establish such confidence. Furthermore, the Company's way of processing your data, is described in detail below.

#### 1. Who processes your personal data?

Upon using the Company's mobile application to 3D scan and take pictures in order to provide the Clinic with needed information to consult the Client, the Client's personal data is transferred to the Clinic through the Company's Product. The process of transferring the data is securely engineered to protect the integrity and identity of the Client and personal data is not accessible by the Company. The Clinic is responsible for the processing of personal data according to applicable law. Please contact the Clinic to learn about their routines for handling personal data in the first place.

#### 2. What data do we transfer, what do we collect and how do we collect it?

*Information transferred to the Clinic through the use of the Company's mobile application* Using the mobile application to capture a 3D scan and pictures of the Client entails entering name, contact information and optional additional information in order to provide sufficient information to the dedicated Clinic of the Client's choice to carry out hair transplant consultation. This data is transferred by the Company to the Clinic in a secure process that protects the identity and integrity of the Client. Upon submitting Client information through the Company's mobile application, 1) the 3D scan and pictures are sent to an encrypted cloud server, defined by an randomised anonymous identification ID, where it is available for the Clinic upon using the Company's desktop product Clinic Platform. The information is deleted from the server when the Clinic starts a consultation session in Clinic Platform, or after 30 days, which of two occurs first 2) an e-mail containing the Client's name, contact information and optional comments, defined by the anonymous identification ID is sent from an encrypted e-mail service to the Clinic's e-mail adress. Immediately after being sent, the e-mail is automatically deleted from the e-mailing service. Through this process, the Clinic receives the information needed to carry out consultation to the Client, while the identity of the Client is not revealed to the Company and the integrity remains

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protected. The only party able to identify the Client is the Clinic, who is also responsible for processing the Client's personal data in compliance to applicable law.

*Information we collect through the Clinic's use of our Product* The Company does not collect data from the usage of the Mobile application but does collect anonymized data from the usage of the Clinic Platform desktop software the Clinic uses to carry out consultation. The collected data does not obtain any personal data from the Clinic's Clients, but consists of data that is equivalent to the position, layout, and area measurements of the planned hair transplant procedure. Furthermore, the Company obtains data regarding the amount of hair and follicles that are estimated or suggested for a certain area. The Company may also gain access to other parameters depending on the Users settings on the Product to visualise a relevant result for the client in question. As the data that is being collected by the Company does not fit within the definition of what is to be considered personal data, the User is solely responsible for its management and any handling of any disputes arising thereof.

All data extracted from the use of the Product is therefore, under no circumstances, to be considered personal. Collected data deriving from the use of the Product is equivalent to digit-formations in the system software that are necessary for the Company's ambition to constantly improve and develop the Service (R&D).

The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as, language, zip/postal code, area code, location, and time zone where the Product is being used or visited so that we can better understand user behaviour and improve our service and advertisement regarding the Product.
- We may also collect information regarding customer behaviour on our website and from our other Services, including but not limited to, 3D usage statistics, surgery information, or success rate. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our Services are of most interest.

In any event, if we do combine non-personal information with personal data the combined information will be processed as personal data for as long as it remains combined.

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**3. How do we process your personal data and for how long?**

Processing and purpose	Lawfulness	Storage limitation
<p><b>1. To ensure safe and effective use of our website.</b>                      We store a text file (a cookie) in your browser to collect information about your use of our website, partly during the time of the visit (session cookie), as well as to tell you what is new since you visited last (cookie).</p>	<p>Consent.</p>	<p>The processed data is stored during the time of your visit to our website (session cookies). Other cookies are saved until you delete them from your browser.</p> <p>By deleting cookies or turning off the function in your browser, you can ensure that the Company no longer processes the information.</p>
<p><b>1. To enable the functionality of the Force HT mobile app</b>                      The company’s third party technology supplier may use the Customer’s and/or the Client of the Customer’s data to enable certain functionality of the mobile application, and in order to enhance their services. Data that is collected:</p> <ul style="list-style-type: none"> <li>- Device information such as device OS, model, and configuration settings</li> <li>- In-app activity data such as ARDK features used (e.g meshing)</li> <li>- Log information such as unique user IDs as well as performance and other diagnostic data</li> <li>- Geospatial information derived from the device camera, which is not persistently stored</li> </ul>	<p>Agreement, legal obligation, and legitimate interests.</p>	<p>Our third party supplier’s privacy policy can be reviewed at any time at <a href="https://nianticlabs.com/privacy">https://nianticlabs.com/privacy</a></p>

#### **4. What are your rights?**

You are not obliged to provide the Company with your personal data. However, where the processing is based on the fulfilment of agreements, the Company may not be able to fulfil its obligations under a certain agreement in lack thereof. If you chose not to provide relevant personal data to the Company, there is an ultimate risk that the Company cannot deliver the service nor other contractual obligations.

We may ask for your consent to process some of your personal data. You are not obliged to give such consent if you do not want your personal data to be processed, regardless of purpose thereto. You may also withdraw your consent at any time by contacting us in that respect. If you choose to withdraw your consent, the withdrawal is valid from the time of revocation, and does not affect processing that the Company carried out during the time before the revocation occurred.

You have the right to:

1. request (register extract), i.e. information about what personal data we process about you and can request a copy of this data,
2. have the personal data you have provided to the Company transferred to another data controller (right to data portability),
3. to have inaccurate personal data corrected, or during special circumstances, deleted;
4. object to the processing of certain personal data about you and request that the processing of your personal data becomes restricted,
5. to withdraw consent for continued processing of the personal data the Company processes under relevant lawful grounds.

For further information on exercising your rights, see contact information for invoking your rights under "Personal data responsibility and contact information". Please note however, that such restriction or deletion of your personal data may give rise to the Company's inability to provide the services described above.

#### **5. Which security measures are being used to protect your personal data?**

The Company takes appropriate technical and organisational measures to protect all personal data against loss, misuse, unauthorised access, disclosure, alteration, and destruction. The Company's employees, contractors and its suppliers are obliged to comply with the Company's rules, personal data policy and other internal regulations that further regulate the processing of personal data.

#### **6. Complaint**

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If you are dissatisfied with how the Company processes your personal data, you may rightfully submit a report to the Swedish Authority for Privacy Protection, which constitutes the supervisory authority.

### **7. Personal data responsibility and contact information**

The Company is responsible for your personal data. If you have any questions about our personal data policy or have any other questions regarding our personal data processing or want to invoke your rights under applicable data protection legislation, please contact us at: [par@forceht.com](mailto:par@forceht.com)