

### **Privacy Policy**

## I. Introduction

The purpose of this Privacy Policy is to inform Vita users about how we protect and process their personal data. In accordance with current legal requirements, this policy is developed to ensure transparency and compliance with the following regulations:

Law No. 78-17 of 6 January 1978 relating to information technology and civil liberties (hereinafter: "Data Protection Act")

Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (hereinafter: "GDPR")

### II. Definition of Personal Data

Personal data refers to all information that can directly or indirectly identify a natural person, such as: surname, first name, postal address, telephone number, email address, IP address, etc.

### III. What Personal Data Is Collected?

Vita collects the personal data necessary for the operation of its services in a transparent manner. Depending on your interactions with our platform, the following types of data may be collected:

Contact data: name, email address, telephone number

Location data: Information about the geographical location when you use features that require geolocation

Browsing data: browsing and app usage history

Transaction-related data: payment information and transaction history Communication data: messages exchanged via our messaging system

The mandatory information for certain processing operations is indicated by an asterisk (\*) on the collection forms.

IV. Data Controller

The data controller is:

Vita SA

Paris, France

V. Contact of the Data Protection Officer

If you have any questions about the protection of your personal data, you can contact our Data Protection Officer at the following address:

dpo@boardvita.com

VI. Purposes of Data Processing

We collect and process your personal data for the following purposes:

User management: account creation and management, customization of the user experience

Transaction management: payment processing and billing management Support and communication: follow-up of requests, management of interactions with customer service

Service improvement: analysis of usage data to improve our services

Security: Preventing fraud and suspicious activity

Marketing: sending commercial offers and information about our services, with your consent

VII. Legal Basis for Processing

Data processing is carried out mainly on the basis of:

Performance of the contract: to provide and manage our services

Consent: for marketing communications and cookies

Legitimate interest: to ensure security and improve our services

VIII. Transmission of Data

Transmission to Subcontractors

We may share your data with subcontractors who act on our behalf and under our instructions. These processors are required to comply with personal data protection obligations.

Transmission to Third Parties

Your data may also be passed on to third parties in the following cases:

Business partners: for additional services Legal authorities: where required by law

IX. Your Rights

In accordance with the GDPR, you have the following rights:

Right of access: obtain information about your personal data Right to rectification: correct inaccurate or incomplete data

Right to object: to object to the processing of your data for legitimate reasons

Right to restriction of processing: restricting the processing of your data in certain cases

Right to portability: receive your data in a structured and commonly used format

Right to erasure: request the erasure of your data where possible

Pour exercer ces droits, vous pouvez nous contacter par e-mail : <a href="mailto:dpo@boardvita.com">dpo@boardvita.com</a>

### X. International Data Transfers

Your data may be transferred outside the European Union. We implement appropriate safeguards, such as standard contractual clauses, to ensure an adequate level of protection during these transfers.

#### XI. Data Retention Period

We keep your personal data for as long as necessary to fulfill the purposes for which it was collected. In general, data is kept for a maximum of three years after your last interaction with our service. Some data may be stored for a longer period of time to comply with legal obligations.

# XII. Application Mobile

The Vita mobile app uses the following features:

Geolocation: to provide services based on your location. You can choose to disable this feature in your device's settings.

Push Notifications: To notify you of important updates. You can manage these notifications in your phone's settings.

Photos / Camera: To add or update your profile or for features related to the services.