KLINEO General Privacy Policy

As of 02.11.2026

KLINEO is incorporated as a simplified joint stock company (S.A.S.) with capital of €15,000, registered with the NANTERRE Trade and Companies Register under number 904 525 706, with its registered office located at 6, rue des Bateliers, 92110 CLICHY.

We are particularly concerned about the protection of personal data and comply with Law No. 78-17 of January 6, 1978, relating to information technology, files, and civil liberties, known as the "Information Technology and Civil Liberties" law (the "Data Protection Act") and European Regulation 2016/679 of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, known as the General Data Protection Regulation or GDPR (the "GDPR").

We have chosen to use a certified "HDS" ("Health Data Host") hosting provider, offering the most advanced guarantees in terms of the standards established by the ANS ("Digital Health Agency").

The purpose of this Policy is to inform Patients, Physicians, Visitors, and Prospective Users of the KLINEO Platform about the Personal Data collected and processed by KLINEO and/or Referring Physicians when they use the Platform and/or KLINEO Services.

The Policy is accessible at any time at the bottom of the Platform.

The terms used in this Personal Data Protection Policy (hereinafter "Policy") with capital letters are defined as follows here.

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Definitions

The definitions attached to these GTC are available here.

SPECIFIC PROVISIONS FOR PATIENTS

IN WHAT CONTEXT DO WE COLLECT YOUR DATA?

Personal Data concerning Patients is collected by KLINEO:

1. Either directly from them, when creating or adding to their Patient Accounts. In this case, the creation of the Patient Account constitutes the Patient's consent to the processing of their health data, in accordance with Article 9.2.a of the GDPR.

2. Either with their Referring Physician, when the latter creates a Patient file, after obtaining the Patient's consent and duly informing them of their rights by providing them with the Patient Information Sheet.

Patients' Personal Data may also be collected automatically when using the Services or browsing the KLINEO Platform. This automatic collection may be carried out in particular through the use of cookies and other trackers.

WHAT ARE THE PURPOSES, LEGAL BASES, AND DURATIONS OF OUR DATA PROCESSING?

In accordance with the regulations, any processing of Personal Data must, in order to be lawful, be based on one of the legal grounds set out in Article 6 of the GDPR.

Personal Data is collected and processed for a limited period of time depending on the purpose of the processing and applicable legislation. At the end of the retention period, the Personal Data of Patients and Visitors is permanently deleted or anonymized.

Depending on the data processing operations carried out, KLINEO may act as Data Controller or Data Processor on behalf of the Referring Physicians.

In the context of Processing carried out as a Subcontractor, KLINEO acts solely on the instructions of the Data Controllers and does not itself determine the legal basis or the retention periods for Personal Data. For security reasons, KLINEO may nevertheless implement default retention periods.

For any questions regarding the legal basis or retention periods for Personal Data for which KLINEO is only a Processor, we recommend that you contact your Referring Physician directly, as the Data Controller.

List of Processing Operations for which KLINEO acts as Data Controller

The table below sets out the various purposes for which we may process your data, the legal basis for each of these purposes, and how long we keep your data in our active database.

Purposes of processing	Nature of Personal Data	Legal basis for processing	Shelf life active base
Creating, managing, and deleting patient accounts	For Each Patient: ■ Nom ■ First name ■ Date of birth ■ Address ■ Email ■ Sexe ■ Phone Number ■ Type of cancer	Necessary for the performance of a Contract to which the Data Subject is party or in order to take steps at the Data Subject's request prior to entering into a Contract (acceptance of the Terms of Use).).	The data is stored for two (2) years in an active database as part of the service. At the end of the contract, the data is pseudonymized and then stored for two (2) years in an archive database for the purpose of improving the algorithm and the patient journey.
Creation of Patient Medical Records for the purpose of searching for a clinical trial	For each Patient: ■ Health insurance coverage (yes/no) ■ Data related to their medical condition: -Type of cancer (affected organ, histology, biomarker, medical reports, biological reports, medical imaging reports) - Medical history Personal data: Physical condition (autonomy, etc.).	Necessary for the performance of a Contract to which the Data Subject is party or in order to take steps at the Data Subject's request prior to entering into a Contract (acceptance of the Terms of Use).). **The creation of a Patient Account by the Patient constitutes the Patient's consent to the processing of their health data, in accordance with Article 9.2.a of the GDPR.**	The data is stored for two (2) years in an active database as part of the service. At the end of the contract, the data is pseudonymized and then stored for two (2) years in an archive database for the purpose of improving the algorithm and the patient journey.

Improvement of Services and Algorithm	▪ Patient ID ▪ Region/city where the patient is located ▪ Frequency of use of KLINEO Services ▪ Account information ▪ Platform connection and usage data ▪ Health data (medical history, patient records, etc.) ▪ IP address	Legitimate interest	The data is stored for two (2) years in an active database as part of the service. At the end of the contract, the data is pseudonymized and then stored for two (2) years in an archive database for the purpose of improving the algorithm and the patient journey.

List of Treatments for which KLINEO acts as Subcontractor to the Referring Physician

Purpose of Processing	Nature of Personal Data
Creation of the Patient Record by the Referring Physician for the purpose of searching for a clinical trial	For Each Patient: ■ Nom ■ First name ■ Date of birth ■ Address ■ Email ■ Sexe ■ Phone Number ■ Health insurance coverage (yes/no) ■ Data related to their medical condition: -Type of cancer (affected organ, histology, biomarker, medical reports, biological reports, medical imaging reports) - Medical history Personal data: fitness level (autonomy, etc.).

SPECIFIC PROVISIONS FOR DOCTORS

IN WHAT CONTEXT DO WE COLLECT YOUR DATA?

Personal Data concerning Physicians is collected by KLINEO:

1. Either directly with them, when creating or adding to their Referring Physician or Investigator Accounts,

2. Either by one of their Patients, when the latter creates their Patient account.

Doctors' Personal Data may also be collected automatically when using the Services or browsing the KLINEO Platform. This automatic collection may be carried out in particular through the use of cookies and other trackers.

WHAT ARE THE PURPOSES, LEGAL BASES, AND DURATIONS OF OUR DATA PROCESSING?

In accordance with the regulations, any processing of Personal Data must, in order to be lawful, be based on one of the legal grounds set out in Article 6 of the GDPR.

Personal Data is collected and processed for a limited period of time depending on the purpose of the processing and applicable legislation. At the end of the retention period, the Personal Data of Patients and Visitors is permanently deleted or anonymized.

Depending on the data processing operations carried out, KLINEO may act as Data Controller or Data Processor on behalf of Referring Physicians. If you have a Referring Physician Account, we invite you to refer to the Data Protection Agreement included in the Appendix to your General Terms and Conditions for Physicians, in addition to this Policy.

List of Processing Operations for which KLINEO acts as Data Controller

The table below sets out the various purposes for which we may process your data, the legal basis for each of these purposes, and how long we will keep your data.

Purposes of processing	Nature of Personal Data	Legal basis for processing	Shelf life active base
Creating, managing, and deleting the Physician Account	For Every Physician: ▪ Nom ▪ First name ▪ Business address ▪ Email ▪ Phone number ▪ Sexe ▪ Name of the center ▪ RPPS / e-CPS ▪ Medical specialty	Necessary for the performance of a Contract to which the Data Subject is party or in order to take steps at the Data Subject's request prior to entering into a Contract (acceptance of the General Terms and Conditions for Physicians).	During the Term of the Agreement
Improvement of Services and Algorithm	▪ Physician ID ▪ Region/city where the physician is located ▪ Frequency of use of KLINEO Services ▪ Account data ▪ Platform connection and usage data ▪ IP address	Legitimate interest	During the Term of the Agreement
Communication about KLINEO's offerings and news for physicians	▪ Nom ▪ First name ▪ Business address ▪ Email ▪ Phone number ▪ Sexe ▪ Name of the center ▪ RPPS / e-CPS ▪ Medical specialty	Legitimate interest	Until opposition

SPECIFIC PROVISIONS FOR VISITORS AND PROSPECTIVE USERS

IN WHAT CONTEXT DO WE COLLECT YOUR DATA?

Personal Data concerning Visitors to the website may be collected automatically when using the Services or browsing the KLINEO Platform. This automatic collection may be carried out in particular through the use of cookies and other trackers.

Personal Data concerning prospective Users may be collected directly from them when they use the contact form available on the Website.

The contact details of prospective physician users may also be collected from Patients, who are asked to provide the identity of their physician when creating a Patient Account on KLINEO.

WHAT ARE THE PURPOSES, LEGAL BASES, AND DURATIONS OF OUR DATA PROCESSING?

In accordance with the regulations, any processing of Personal Data must, in order to be lawful, be based on one of the legal grounds set out in Article 6 of the GDPR.

Personal Data is collected and processed for a limited period of time depending on the purpose of the processing and the applicable legislation.

Purposes of processing	**Nature of Personal Data**	**Legal basis for processing**	**Shelf life active base**
Improvement of Services and Algorithm	■ Region/city of location ■ Account information ■ Platform usage data ■ IP address	Legitimate interest	During 13 months
Communication about KLINEO's offerings and news for Prospective users For patients	For each prospective user and depending on the communication channel: ■ Nom ■ First name ■ Date of birth ■ Business or personal address ■ Email ■ Sexe ■ Phone Number ■ Type of Cancer	Necessary for the performance of pre-contractual measures taken at the request of the data subject	For 3 years from the date of collection or the last contact made by the Prospective User

for physicians	▪ First name ▪ Business address ▪ Email ▪ Phone number ▪ Sexe ▪ Name of the center ▪ RPPS / e-CPS ▪ Medical specialty	Legitimate interest	Until opposition

GENERAL PROVISIONS

WHAT ARE YOUR RIGHTS?

In accordance with current regulations, you have, with some exceptions:

• the right to obtain confirmation as to whether or not personal data concerning you are being processed and, where they are, access to said personal data as well as to several pieces of information about our processing operations (**right of access – Article 15 of the GDPR**);

• the right to obtain the rectification of inaccurate personal data concerning you (**right to rectification – Article 16 of the GDPR**);

• the right to obtain from us the erasure of personal data concerning you in certain cases (**right to erasure or "right to be forgotten" – Article 17 of the GDPR**);

• the right to obtain restriction of processing in certain cases (right to restriction of processing – Article 18 of the GDPR);

• the right to receive the personal data you have provided to us, in a structured, commonly used, and machine-readable format, and/or to request that we transmit this data to another data controller, where the processing is based on consent or on a contract and the processing is carried out using automated means (right to data portability – Article 20 of the GDPR);

• the right to obtain, for reasons relating to your particular situation, that we no longer process your personal data in certain cases (**right to object – Article 21.1. of the GDPR**);

• the right to object to the processing of your personal data for marketing purposes (**right to object to marketing – Article 21.2. of the GDPR**).

• the right not to be subject to a decision based solely on automated processing that produces legal effects concerning them or similarly significantly affects them (**right not to be subject to automated individual decision-making – Article 22 of the GDPR**) – our processing operations are not affected.

The existence or otherwise of these various rights depends in particular on the legal basis for the processing to which the request relates.

HOW TO EXERCISE YOUR RIGHTS?

To exercise your rights or for any requests concerning the processing of your Personal Data, you may contact:

1. When KLINEO acts as Data Controller:

By email to (dpo@klineo.fr) or by post to the following address (Klineo DPO, 6 Rue des Bateliers, 92110 CLICHY)

If we have reasonable doubts about your identity, we may ask you for additional information or documents to verify your identity (for example, in some cases, a black and white copy of the front of your ID card).

1. When KLINEO acts as a Subcontractor for a Referring Physician:

In this case, we invite you to contact your referring physician directly, who will be able to answer your questions.

In both cases, you also have the right to lodge a complaint with the competent supervisory authority (in France, this is the Commission Nationale de l'Informatique et des Libertés, or CNIL).

SECURITY & ACCOMMODATION

Personal Data is stored in France at OVH Cloud. This hosting provider is certified "HDS" ("Health Data Host"), in accordance with the law and standards established by the ANS ("Agence du Numérique en Santé" - Digital Health Agency), in consultation with the CNIL ("Commission nationale de l'informatique et des libertés" - National Commission for Information Technology and Civil Liberties).

This certification attests to advanced security measures to protect health data hosting centers, ensuring the confidentiality of said data.

Privacy by design: KLINEO ensures that protection and security
data is taken into account in the planning and development of its Services.

TO WHOM ARE WE LIKELY TO TRANSFER YOUR HEALTH DATA? ARE WE LIKELY TO TRANSFER YOUR HEALTH DATA OUTSIDE THE EUROPEAN ECONOMIC AREA?

All Health Data is hosted on OVH Cloud servers that are certified as Health Data Hosts (HDS) and are located exclusively in France.

All our employees and subcontractors are bound by confidentiality and security obligations and provide sufficient guarantees in accordance with the regulations in force.

With regard to the processing of Personal Data that is not Health Data (e.g., support services), we may use subcontractors that are not located within the European Union.
If the transfer takes place to a third country where the legislation has not been recognized as providing an adequate level of protection for Personal Data, we ensure that the necessary measures are put in place, in accordance with the French Data Protection Act and Articles 46 and 49 of the GDPR.

EMAIL OPEN TRACKING

The emails we send you may contain a pixel, i.e. an invisible image that lets us know whether and when an email has been opened.

Purpose: to check that our notifications reach you and to avoid sending you unnecessary reminders.

Data collected:

3. your email address;

4. the date and time the email was opened;

5. technical data collected by the pixel when the email is opened: IP address, type of device or email client.

Legal basis:

6. if you registered in France after the consent checkbox was introduced (on the registration form or via Pro Santé Connect): the tracking is based on your prior consent (Article 6.1.a of the GDPR), collected through an optional checkbox. If you did not tick this box, the opening of your emails is not tracked;

7. in all other cases (registration before this checkbox was introduced, or registration outside France): the tracking is based on our legitimate interest in ensuring that our notifications are properly received (Article 6.1.f of the GDPR). You are informed of it through this Policy and may object to it at any time; the tracking remains active until you object.

Recipient: this data is processed by Brevo, our processor responsible for sending emails, which also stores your choice regarding this tracking (consent, refusal or objection), together with its date and origin. This data is never sold or transferred to third parties.

Retention period: email open data (date, time and technical data) is kept for twelve (12) months from the opening of the email and then deleted. Your choice regarding this tracking (consent, refusal or objection) is kept for as long as your account exists.

How to object or withdraw your consent: you can do so at any time, free of charge:

8. by clicking the "Stop tracking the opening of my emails" link at the bottom of each email;

9. by writing to our DPO: dpo@klineo.fr.

Withdrawing your consent does not affect the lawfulness of the tracking carried out before its withdrawal.

No impact: objecting to this tracking does not change the emails you receive: you will continue to receive the same notifications.

CAN POLITICS CHANGE?

We regularly update our Privacy Policy.

You will be notified of any updates, and where your consent is required, your consent will be obtained.

WHO IS YOUR CONTACT PERSON FOR ANSWERING YOUR QUESTIONS ABOUT THE PROCESSING OF YOUR PERSONAL DATA BY KLINEO?

If you have any questions regarding the processing of your Personal Data, you can contact us by email at (dpo@klineo.fr) or by post at the following address (Klineo DPO, 6 Rue des Bateliers, 92110 CLICHY).