

WITHINGS PRIVACY POLICY

The Withings Privacy Policy (this “Privacy Policy”) describes how Withings SAS (“Withings,” “we,” “us,” or “our”) collects, processes, stores, and discloses your personal data when providing services to users through its website, apps, and Services (our “Services”).

RESPECT FOR YOUR PERSONAL DATA IS AT THE HEART OF OUR SOLUTIONS

We thank you for your trust and are committed to honoring it. We handle the personal data you entrust to us with the utmost care to help you improve your health. Respect for privacy is a fundamental principle that we place at the heart of our strategy for developing our Services. We are committed to a process of continuous improvement to ensure the utmost respect for your personal data. If you have any questions, [please contact us](#).

SECURE HOSTING OF YOUR HEALTH DATA: OUR DAILY PRIORITY

We pay the utmost attention to the security of your health data storage. We adhere to strict regulations and standards. In addition to our compliance with the GDPR, we are ISO 27001 and HDS (Health Data Host) certified, which allows us to provide you with the same level of security as we do for healthcare professionals. We host health data on our [certified platform for processing health data](#), whose servers are located in France at a European service provider. WITHINGS is also ISO 27701 certified, an international standard attesting to a high level of protection for personal data.

GLOBAL AND UNIFORM APPLICATION

This Policy applies uniformly to all Users of the Withings App, regardless of your place of residence. We take into account the personal data protection regulations applicable to the markets in which WITHINGS sells its Services.

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Your consent is obtained for specific processing activities. You may withdraw your consent at any time. In accordance with Article 7 of the GDPR, the withdrawal of consent applies only to future processing and does not affect the lawfulness of processing carried out prior to such withdrawal.

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IV. PROCESSING OF PERSONAL DATA

We process all Personal Data (as defined below) for a specific purpose and on an identified and necessary legal basis. We retain Personal Data for a specified period.

V. DATA RETENTION

We retain your Personal Data only for as long as necessary to fulfill the purposes described in this policy. Retention periods may vary depending on the categories of data and processing activities, as well as applicable legal requirements. At the end of the retention period, your Personal Data will be deleted or anonymized using processes and methods that comply with personal data protection standards.

VI. DATA HOSTING, TRANSFER, AND SECURITY

Your Personal Data is hosted in France, and Health Data is not transferred outside the European Economic Area (EEA). However, other data may be transferred to our partners located outside the EEA. WITHINGS will take several measures in the event of a data breach.

VII. EXERCISING YOUR RIGHTS

You may exercise your rights under the GDPR by contacting the Data Protection Officer at: Withings - DPO, 2 rue Maurice Hartmann - 92130 Issy-les-Moulineaux, or by email at privacy@withings.com. You may also file a complaint with the data protection supervisory authority.

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I. SOME KEY CONCEPTS

This privacy policy applies to your use of the Withings App published by WITHINGS. The Withings App is a free application (web and mobile) with paid versions (for Withings+ users) that focuses on three areas: (i) health tracking, (ii) staying motivated, and (iii) setting up WITHINGS products. The Withings App can be used on its own or in conjunction with our products. The personal health data you provide to us is sensitive information that we process in accordance with identified legal bases and in compliance with the highest security standards.

1.1. DATA ABOUT YOU

“Anonymized data” refers to data resulting from the processing of personal data intended to irreversibly prevent the identification of the data subject, taking into account the techniques that can reasonably be implemented.

“Pseudonymized data” refers to personal data that cannot be attributed to a natural person without the use of additional information.

“Personal data” refers to any information relating to an identified or identifiable individual. This includes all types of information: last name, first name, mailing address, email address, etc. It also encompasses the concept of Personally Identifiable Information (PII) as defined by U.S. regulations.

“Health data” refers to personal data relating to your past, present, or future health (physical or mental). Health data is particularly sensitive and, for this reason, is subject to special protective measures.

1.2. GDPR GLOSSARY

“Legal Basis” refers to the grounds authorizing the Data Controller to process personal data (including the data subject’s consent, the performance of a contract, WITHINGS’ legitimate interest, the protection of vital interests, and compliance with a legal obligation).

“Legitimate interest” refers to the pursuit of the Data Controller’s core mission (WITHINGS processes indirectly identifiable data to advance research based on legitimate interest).

“GDPR” refers to the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. **It is applied by WITHINGS worldwide.**

“Data Controller” means the person who determines the purposes and means of processing Personal Data.

II. SOURCE OF THE PERSONAL DATA WE PROCESS

Personal Data is collected when you visit the website, use the Services, and navigate the app.

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2.1. OUR WEBSITE. Our website uses cookies. To learn more about how Withings uses them, please refer to our [cookie policy](#).

2.2. USE OF THE SERVICES. Using the Services results in the creation of Personal Data in the following situations:

a. Account Creation. When you create a WITHINGS account, you provide Personal Data related to your identity, such as your last name, first name(s), age, and email address. This account allows you to access the Personal Data about you generated while using the Services, and it also allows you to modify certain information.

b. Use of Our Services. When you use our Services, Personal Data is collected (such as the number of steps, distance traveled, calories burned, your weight, your heart rate, your sleep stages, your minutes of activity, and, in some cases, your location). The data collected varies depending on the device you use and how you use it. You can consult the [User Guide](#) to learn about all categories of Personal Data processed by the Product.

c. Partner Apps. When you link your Withings account to other apps or products, data from the Withings App is synced with the app of your choice. This is particularly the case when you connect an artificial intelligence assistant to your account via our MCP (*Model Context Protocol*) server. This connection requires that you have first enabled the artificial intelligence features in your Withings app. You may also consent to WITHINGS collecting Personal Data about you from these third-party apps or products to improve your experience and our Services. You can modify or withdraw your consent for this processing of Personal Data through the settings in your Withings app. For your information, the publisher of the partner app becomes the Data Controller once the data is shared with the third-party app. We encourage you to review the privacy policies of these third-party apps, as this Policy applies only to the products and services offered by WITHINGS.

d. Targeted Communications. To provide you with communications tailored to your products and habits, we create user groups with similar interests. Defining these user groups allows us to send you content tailored to your needs, ensuring an optimal experience when using Withings products and the Withings app. These groups also enable us to deliver targeted advertising content to you on third-party partner platforms. We never share information related to your health with these partners; we only share certain data, such as your hashed email address, which allows partners to identify you in order to deliver relevant advertising content. These platforms act as processors for the display of this advertising content.

Withings may send you an email asking you to update your consent to receive targeted communications. You can opt out of receiving targeted communications at any time in the “Notification Settings” of the app.

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e. Customer Support. When you contact customer support, certain Personal Data associated with your WITHINGS account may be temporarily accessible to our teams depending on the issue you're experiencing, such as data related to the products you use. No Health Data is accessible to our customer support staff without your prior consent.

f. Event Tracking. Certain Personal Data is collected automatically when you use the Services, particularly through the use of trackers. We collect technical information such as: IP addresses, language, operating system, location (depending on the permissions you have granted us), and information about the smartphone used (model, version, etc.).

III. YOUR CONSENT

We obtain your consent for specific processing activities. You may withdraw your consent at any time.

3.1. OBTAINING YOUR CONSENT. We obtain your consent for the processing of data for:

1. Providing your health data (when you create your account);
2. Participation in our research programs;
3. Sharing your data with third-party partner applications;
4. Enabling two-factor authentication (2FA);
5. Marketing communications, including targeted communications;
6. Viewing the route taken during an activity via the Withings App;
7. Withings+ programs and personalization of the user experience;
8. The use of artificial intelligence algorithms to provide you with a personalized experience.

3.2. WITHDRAWAL OF YOUR CONSENT

You may withdraw your consent at any time. To do so, simply:

1. Delete your account ([here](#));
2. Uncheck "Research Hub" in your notification center ([Android](#) / [iOS](#));
3. Disconnect from third-party apps;
4. Turn off two-factor authentication in your account settings ([Android](#) / [iOS](#));
5. Uncheck "Promotional Offers" in your notification center ([Android](#) / [iOS](#));
6. Delete the activity track via the app;
7. Unsubscribe from the Withings+ service via the app settings;

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8. Disable this feature in the app settings.

IV. PROCESSING OF PERSONAL DATA

4.1. NECESSITY OF PROCESSING. We collect your Personal Data in order to fulfill the various purposes listed below. If you do not wish to provide this information to us, you will not be able to access certain parts of our products and services, or the services offered by our customer support.

4.2. LIST OF PROCESSING ACTIVITIES

A) USE OF PRODUCTS AND SERVICES

1. Purchase and delivery of your WITHINGS products and services via our website

DATA PROCESSED: Last Name / First Name / Email Address / Mailing Address / Phone Number / Credit Card Number / IP Address / MAC Address of the purchased product

LEGAL BASIS: Performance of the contract (acceptance of the [General Terms and Conditions of Sale](#))

RETENTION PERIOD: WITHINGS is required by law to retain billing data for 10 years. When you subscribe to a Withings+ subscription, your banking information may be stored with a partner to facilitate the renewal of your subscription.

2. Creating a Withings App Account

DATA PROCESSED: Email address / Date of birth / First and last name / Password (optional) / IP address / MAC address / Profile picture (optional) / Height / Weight / Country of residence

LEGAL BASIS:

- Performance of the contract (acceptance of the [Terms of Use](#)).
- User consent for health data.

RETENTION PERIOD: Data is retained until you delete your Withings App account.

3. Making your Personal Data available on the Withings app through the synchronization of Personal Data between the Products and the Withings app

DATA PROCESSED: Physiological data (including health-related data and data concerning sexual activity) and technical data collected when you use our Services. For more details regarding the health data collected by our various products, please refer to our [User Guide](#) (section "Personal Data").

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LEGAL BASIS:

- Necessary for the performance of the contract (acceptance of the [Terms of Use](#)) for personal data. Without this synchronization between Withings servers and the Withings app, you will not be able to use the Services to which you have subscribed;
- User consent for health data.

RETENTION PERIOD: Data is retained until you delete your Withings App account. You also have the option to delete certain data via the Withings App.

4. Optional sharing of Personal Data with third-party apps

DATA PROCESSED: The data exchanged varies depending on the service used.

LEGAL BASIS: Your consent to the sharing of your Personal Data.

RETENTION PERIOD: Data is shared until sharing is disabled or the user account is deleted.

5. Viewing the route taken during an activity via the Withings App

DATA PROCESSED: Location data collected during physical activity

LEGAL BASIS: Consent

RETENTION PERIOD: The data is retained until the user account is deleted.

6. Withings+ programs and personalization of the user experience (paid service)

DATA PROCESSED: User ID / Weight goal / Muscle mass / Body fat

LEGAL BASIS: Consent

RETENTION PERIOD: Data is retained until the user account is deleted.

7. Weather display on scales

DATA PROCESSED: IP address / Geolocation

LEGAL BASIS: Necessary for the performance of the contract (acceptance of the [Terms and Conditions of Use](#)).

RETENTION PERIOD: Data is retained until the user account is deleted.

8. Enabling the ECG feature on ScanWatch (applies to the United States only)

DATA PROCESSED: Last Name / First Name / Date of Birth / Phone Number / Email Address / State of Residence

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LEGAL BASIS: Consent

RETENTION PERIOD: The data is retained for 7 years by the service provider Heartbeat Health.

9. Use of artificial intelligence algorithms to provide you with a personalized experience

DATA PROCESSED: Data related to your user profile, such as your first name, age, height, weight, and gender. Physiological data, including your health data. This data is pseudonymized so that it cannot be used to directly re-identify you. However, you have the option to provide the AI with directly identifiable information via chat if you wish.

LEGAL BASIS:

- Necessary for the performance of the contract (acceptance of the [Terms of Use](#)) for non-sensitive personal data
- User consent for health data

RETENTION PERIOD: Data is retained until the user account is deleted.

10. User display on a multi-user product

DATA PROCESSED: Last Name / First Name / Profile Photo

LEGAL BASIS: Legitimate interest

RETENTION PERIOD: Data is retained until the user account is deleted.

B) COMMUNICATION AND SUPPORT

1. Creation and management of user audience groups (segmentation)

DATA PROCESSED: Hashed email address, user ID, data related to products used, your interactions with Withings

LEGAL BASIS: Consent—To tailor our communications to your interests and needs in order to provide you with a personalized experience

RETENTION PERIOD: Data is retained as long as your account is active or until you no longer wish to receive notifications

2. Sending personalized marketing communications (via email, notifications, or third-party platforms)

DATA PROCESSED: Email address, user ID, audience group

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LEGAL BASIS:

- **Individuals who have made a purchase on the withings.com website:** Legitimate interest (in accordance with Article L34-5 of the French Postal and Electronic Communications Code) — To offer you products or solutions related to your previous purchases
- **Others:** Consent to receive marketing communications and to update this consent

RETENTION PERIOD: Data is retained as long as your account is active or until you no longer wish to receive notifications

3. Sending communications regarding the activation of new features (via email or notifications)

DATA PROCESSED: Email address, user ID, audience group

LEGAL BASIS: Necessary for the performance of the contract (acceptance of the [Terms and Conditions of Sale/Terms of Use](#))

RETENTION PERIOD: Data is retained as long as your account is active or until you no longer wish to receive notifications

4. Improving navigation on the Site

DATA PROCESSED: Login data (see [Cookie Policy](#))

LEGAL BASIS: Consent obtained via the cookie banner

RETENTION PERIOD: 3 months

5. Customer Support

DATA PROCESSED: Email address / Last name / First name / Purchase history / Content of the request / Technical product data

LEGAL BASIS:

- Necessary for the performance of the contract (acceptance of the [Terms and Conditions of Sale/Terms of Use](#))
- User consent for health-related data.

RETENTION PERIOD: Data associated with the support ticket is retained for 10 years or until the user account is deleted.

6. Customer Support - Requests made via Withings' official social media accounts

DATA PROCESSED: Last Name / First Name / Content of the request / Username

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LEGAL BASIS: Legitimate interest—to centralize customer support requests in order to respond to them as effectively and quickly as possible, thereby providing you with a positive user experience

RETENTION PERIOD: Data associated with the support ticket is retained for 10 years or until the user account is deleted.

7. Customer Support Satisfaction Survey

DATA PROCESSED: Email address

LEGAL BASIS: Legitimate interest—to identify areas for improvement in our customer support in order to provide you with a better user experience

RETENTION PERIOD: Data associated with the support ticket is retained for a maximum of 5 years.

8. Product Vigilance for WITHINGS Products

DATA PROCESSED: Last Name / First Name / Email Address / Mailing Address / Phone Number / Age / Consequences of the adverse event for the user / Medical Conditions (in the context of an adverse event occurring during a clinical trial)

LEGAL BASIS: Legal obligation

RETENTION PERIOD: 15 years from the date of reporting

9. Anonymization of your interactions on the mobile app and Withings products to improve your experience

DATA PROCESSED: Interactions on the mobile app and products (taking a measurement, using a feature, etc.)

LEGAL BASIS: Legitimate interest

C) SECURITY AND EXERCISING YOUR RIGHTS

1. Enabling two-factor authentication (2FA) via text message, phone call, or authentication code

DATA PROCESSED: Phone number

LEGAL BASIS: Your consent when activating this feature

RETENTION PERIOD: The number is retained until the user account is deleted or this feature is deactivated

2. Prevention and combating of computer fraud and cyberattacks

DATA PROCESSED: Pseudonymized data regarding the various actions performed by the user

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LEGAL BASIS: Legitimate interest—to identify abnormal behavior in order to protect the infrastructure and data managed by Withings

RETENTION PERIOD: 1 year from the date the action is recorded.

D) RESEARCH AND DEVELOPMENT

1. Sending “Research” questionnaires and analyzing the responses received

DATA PROCESSED: User ID / The content of the questionnaire varies depending on the issues addressed

LEGAL BASIS: Consent of the person completing the questionnaire

RETENTION PERIOD: Pseudonymized data is retained until the account is deleted.

2. Anonymization of data for research purposes

DATA PROCESSED: Health data relevant to the study

LEGAL BASIS: Consent of the individual

3. Conducting research for public interest purposes

DATA PROCESSED: Data deemed relevant to the study

LEGAL BASIS: Legitimate interest

RETENTION PERIOD: Personal data is retained for as long as deemed necessary based on the study. This information will be provided to you in the information notice.

4. Improvement of Products and Services (including improving algorithm performance and generating statistics)

DATA PROCESSED: Relevant data related to the performance of these processing activities. This consists exclusively of pseudonymized data

LEGAL BASIS: Legitimate interest—to have statistical data on our users in order to improve and develop new features

RETENTION PERIOD: Personal data is retained until the user account is deleted.

4.3. DATA SHARING: We share this data only under the circumstances described below:

a. Your Control Over Your Data. You can ask us to disclose information to others, such as when you use our community features like forums or programs that require sharing with third parties. You can change your preferences at any time by adjusting your account settings or by visiting our [Help Center](#).

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b. Internal and Legitimate Sharing. Personal Data may be processed by employees of WITHINGS SAS and its subsidiaries, within the scope of their respective responsibilities and exclusively for the purposes described in this Policy.

c. Use of Our Processors. We share certain Data with processors who are experts in their field to enable the provision of products and services. Our processors are required to comply with the GDPR and process the shared data solely for the intended purpose. We will use processors to help us ensure the quality of certain services and products, which you can find in the list available [here](#).

d. Using a ScanWatch in the United States. WITHINGS may share certain personal information (name, date of birth, email address, mailing address, phone number) with Heartbeat Health, a U.S.-based company, which provides you with services such as the prescription required for the device's ECG feature, the organization of telemedicine consultations with our healthcare partners, and the provision of health advice. Your consent to receive text messages from Heartbeat Health is required to activate the ECG feature on your device. Please review [Heartbeat Health's privacy policy](#) for more information.

e. Legal Reasons. We may share your personal data when required by law, upon a court order, in connection with legal proceedings, or if we believe in good faith that disclosure is reasonably necessary **(a)** to investigate, prevent, or take action regarding suspected or actual illegal activities, or to assist public authorities; **(b)** to investigate and defend against any claims or allegations by third parties; **(c)** to protect the security or integrity of our services. We will notify you of any legal proceedings seeking access to your Personal Data, unless we are prohibited by law from doing so. In cases where a court order specifies a period during which the request must not be disclosed to the individuals concerned, we will send you a delayed notification after the non-disclosure period has expired.

V. DATA RETENTION

5.1. RETENTION PERIOD. The retention period indicated in the list of processing activities depends on the type of data, the purpose of the processing, and our legal obligations. If you request it, WITHINGS will delete your personal data from its servers and instruct its data processors involved in the processing to do the same. We use data processors to manage backup data. This data will be used in the event of an operational issue to ensure the continuity of our services and products. Please note that, for security reasons, we are unable to apply data deletions or modifications to backups that have already been made, in order to protect the integrity of the backup data.

5.2. INACTIVE ACCOUNTS. Your Withings account will be considered inactive if, for 10 years, **(i)** you have not used the mobile or web app, **(ii)** you have not taken any measurements with the Withings products associated with the account, and **(iii)** you have not clicked on any links contained in an email sent by WITHINGS. You will receive an email notification 90 days before your account is deemed inactive, giving you the opportunity to continue your WITHINGS experience. If you take no action, your account and the associated data will be deleted in accordance with this Policy.

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5.3. ANONYMIZED DATA. WITHINGS may anonymize your data in compliance with applicable security standards and regulations. Once anonymized, the data can no longer be used to identify you and is no longer considered Personal Data. WITHINGS uses the data in this form to participate in research projects.

5.4. DATA SHARED WITH THIRD PARTIES. If you have chosen to share your data from WITHINGS Products and Services with third parties, we cannot guarantee the deletion or anonymization of that data. We encourage you to contact the third party for more information.

VI. DATA HOSTING, TRANSFER, AND SECURITY

Your Personal Data is hosted in France, and Health Data is not transferred outside the EEA. However, other data may be transferred to our partners located outside the EEA. WITHINGS will take several measures in the event of a data breach.

6.1. HOSTING IN EUROPE. Our services are provided by our [certified platform for processing Health Data](#) via a European hosting provider located in France. The Health Data processed is not transferred outside the European Economic Area.

6.2. PROCESSORS. Other data may be shared with partners located outside the European Economic Area for specific purposes (such as telecommunications or the security of banking transactions). The list of our processors is available [here](#).

6.3. SECURITY. We invite you to visit our [dedicated page](#).

VII. EXERCISING YOUR RIGHTS

You can exercise your rights by contacting us at privacy@withings.com.

7.1. YOUR RIGHTS. You may exercise the following rights on your own or with our assistance.

a. Right to Information: You have the right to know how Withings processes your personal data. This policy is intended to inform you about how we process your Personal Data in connection with your use of our products and services, your use of the website, and your navigation within the app. This Policy is designed to provide you with this information in as clear a manner as possible. If you have any additional questions, please do not hesitate to contact us. You can also consult our [User Privacy Guide](#).

b. Right of Access. You may access the Personal Data about you that is processed, collected, or stored by WITHINGS. You can find this information directly in [your account](#) or through [customer support](#).

c. Right to Rectification. If you find that your Personal Data is inaccurate, you have the right to request that it be corrected. Certain Personal Data can be modified directly from your Withings account.

d. Right to Restriction and Right to Object. If you find that data about you is inaccurate, you may ask us to stop processing that data until the situation is corrected. You may also ask us to stop processing your Personal Data.

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e. Right to Erasure: You may request the deletion of your Personal Data. We will assist you in deleting your Personal Data through [your account](#) or [customer support](#).

f. Right to Data Portability: You may request that we provide you with your Personal Data so that you can share it with another company. Instructions on how to exercise your right to data portability are available in our Help Center, under the [“Import and Export Data”](#) section.

g. Automated Individual Decision-Making and Profiling: We do not use your Personal Data for automated individual decision-making or profiling.

7.2. ASSISTANCE IN EXERCISING YOUR RIGHTS. You may exercise your rights at any time by writing to privacy@withings.com. You may be asked to provide proof of identity if we have no other way to verify that you are the account holder to whom the data pertains. WITHINGS processes all requests that are not excessive within the timeframes set forth by the GDPR.

7.3. ASSISTANCE FROM THE CNIL. In the event of a dispute, you have the right to file a complaint with the Commission Nationale de l’Informatique et des Libertés (CNIL), whose headquarters are located at 3 Place de Fontenoy, TSA 80715, 75334 Paris Cedex 7.

VIII. PERSONAL DATA PROTECTION POLICY FOR PATIENT USERS

Specific provisions regarding the collection and use of your personal data, its security, and its sharing with third parties apply to you if you use our remote patient monitoring (“RPM”) services.

8.1. SCOPE OF APPLICATION

a. Applicability to Patient Users. We collect and use your Personal Data in connection with your use of the Withings App as part of the WITHINGS Remote Patient Monitoring solution (“WRPM”). This Policy, along with the following specific provisions, applies to the Personal Data we collect from Users of the **WRPM** solution.

b. General Terms of Use for Patient Users. This Policy is part of the WITHINGS Terms of Use for Patient Users available [here](#). By accessing or using our services for Patient Users, you acknowledge that you have read and accepted the applicable Terms of Use. If you do not agree, you must stop using our services for Patient Users. We will notify you of any significant changes to our Patient Personal Data Protection Policy.

8.2. PATIENT USERS’ RIGHTS. Certain information is sent by your healthcare provider and is therefore not directly under our control. Questions or concerns regarding your medical record or the Personal Data provided to us by your healthcare provider should be directed to your healthcare provider. This information is not under the direct control of WITHINGS.

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IX. PRIVACY POLICY FOR USERS OF THE CARDIO CHECK-UP FEATURE

Specific provisions regarding the collection and use of your Personal Data apply when you use the Cardio Check-up feature. This feature allows you to have your ECG reviewed by a certified physician.

This review is conducted by trusted partners to ensure the protection of your Personal Data. If you reside in Europe, Canada, or Hong Kong, your Personal Data is shared with our partner DPV Analytics and will be processed by them in accordance with [their own privacy policy](#). If you reside in the United States, your personal data is shared with our partner Heartbeat Health and will be processed by them in accordance with [their own privacy policy](#).

This processing of Personal Data is necessary for the purposes described below.

9.1. Sending your Personal Data to our partner for ECG review

DATA PROCESSED: last name, first name / age / weight, height, ECG data, and all health data concerning you.

LEGAL BASIS: consent

9.2. The ability for the partner physician to contact you again if they deem it necessary

DATA PROCESSED: phone number

LEGAL BASIS: consent

9.3. Sending marketing communications from our partners

DATA PROCESSED: email address

LEGAL BASIS: consent

9.4. Personalized recommendations based on your ECG data from Withings

If you consent, Withings uses your ECG data to offer you the Cardio Check-up feature. Thus, when one of your ECGs is classified as abnormal, Withings may offer you a review of your ECG by a healthcare professional:

- If you are a Withings+ subscriber and have a Cardio Check-up available, Withings will remind you that you can use it;
- If you are not a Withings+ subscriber, Withings may offer you a Withings+ trial that includes your first Cardio Check-up.

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DATA PROCESSED:

- Health data: Classification of your ECGs (normal/abnormal and type of result), date of the measurement, status of your Cardio Check-up requests (in progress, completed);
- Subscription data: Withings+ status (subscriber or non-subscriber), number of available Cardio Check-ups.

LEGAL BASIS:

- User consent for non-sensitive data
- User consent for sensitive data

RETENTION PERIOD: Personal data is retained until the user account is deleted.

X. PRIVACY POLICY FOR USERS OF STETHO SENSE

Specific provisions regarding the collection and use of your personal data apply when you use the StethO Sense feature. This processing of personal data is necessary for the following purpose: sending your personal data to our partners for the analysis of cardiac and/or pulmonary signals using artificial intelligence algorithms. Pulmonary signals are sent to our partner StethoMe. Cardiac signals are sent to our partner eMurmur.

DATA PROCESSED: cardiac and pulmonary signals recorded by BeamO, analyses generated by the detection algorithm, user ID, and age.

LEGAL BASIS:

- Necessary for the performance of the contract for non-sensitive data
- Explicit user consent for health data. The user may withdraw their consent at any time in the App's settings; they will then no longer be able to request a new analysis.

RETENTION PERIOD: Personal data is retained until the user account is deleted.

XI. GENERAL TERMS AND CONDITIONS

Applicability of the Terms and Conditions. This Privacy Policy is subject to [the Terms and Conditions](#) of Withings SAS.

Changes to the Privacy Policy. We regularly update this Privacy Policy and will notify you of any significant changes in accordance with applicable laws and regulations. The date this Privacy Policy was last updated is listed at the bottom of this page. We may contact you via email or other channels to remind you of the contents of this policy, but we encourage you to review this page regularly.

Contact Information. To ask a question or provide feedback regarding this policy or our privacy practices, please contact us by email at: privacy@withings.com