

# Personal Data Protection Policy

*December 2024*

## INTRODUCTION

Respect for privacy is a fundamental right and one of Doctolib's core values.

Doctolib undertakes to comply with European regulations on the protection of Personal Data, in particular the General Data Protection Regulation (EU) of 27 April 2016 ("GDPR") and with local applicable data protection laws.

We work with the authorities in charge of data protection, at a European and national level to ensure that we comply with all of our legal obligations in terms of the protection of Personal Data and Health Data.

Doctolib has a team dedicated to the protection of Personal Data, including a group data protection officer declared to the local data protection authority ("DPA"), a security team, a legal team and engineers specialised in data protection.

For more information on the commitments made by Doctolib to protect the Personal Data of its users, you can view our [website](#).

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## 1. DEFINITIONS

The terms used in this Personal Data Protection Policy (hereinafter "Policy") with capital letters have been defined in the "Definitions" document available [here](#).

In the event of a conflict between the terms defined in this Policy and the terms of the "Definitions" document, the terms of this Policy shall prevail.

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## 2. WHAT IS THE PURPOSE OF THIS POLICY?

Doctolib sets out in this Policy how it processes and protects your Personal Data.

This Policy applies to all natural persons Users of the Doctolib Siilo App and Visitors of the website [www.Siilo.com](http://www.Siilo.com), who are established in countries where the Doctolib platform is not available.

This Policy does not govern data that Users send through the App or Services to other Users (e.g. through Doctolib Siilo Messenger, Doctolib Siilo Webchat). Users can find more information on how Personal Data and Health Data is shared through Doctolib Siilo Services in the Processor Agreement attached to the Terms of Use.

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### 3. WHAT IS THE ROLE OF DOCTOLIB REGARDING YOUR PERSONAL DATA ?

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*In accordance with the GDPR, there are two main roles:*

- *The Data Controller is the person who determines the reason why and how Personal Data are processed ;*
- *The Processor is the person processing Personal Data on behalf of the Data Controller. It acts under the authority of the Data Controller and on its instructions.*

Siilo Holding BV is a 100% owned subsidiary of Doctolib SAS (a company incorporated under French law) and is fully integrated into the Doctolib Group. Doctolib largely harmonised data protection standards within the Group in order to achieve a harmonised and consistent level of data protection and data security.

The processing that takes place in connection with the use of the "Doctolib Siilo App" is therefore integrated into the Doctolib data protection information.

As Data Controller, Doctolib takes all appropriate measures to ensure the protection and confidentiality of the Personal Data it holds or processes in compliance with the provisions of the GDPR.

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### 4. WHERE DOES DOCTOLIB GET YOUR PERSONAL DATA FROM?

Your Personal Data processed by Doctolib is collected from different channels.

1. Personal Data directly provided by User or Client

Doctolib may process Personal Data provided directly by you (i) at the time of creating your User Account or when using the Doctolib Siilo Services, (ii) via contact forms or any other document available online on the Sites and/or provided during external events such as trade fairs, (iii) during exchanges by telephone or email with Doctolib.

2. Personal Data that Doctolib automatically collects when you use the Doctolib Siilo Services

Doctolib may automatically collect your Personal Data when using the Services and browsing the Doctolib Siilo Services. This automatic collection can be done through the use of cookies and other trackers.

For more information, you can view our Cookie Policy available in the footer of our websites.

## 5. WHAT DOES DOCTOLIB DO WITH YOUR PERSONAL DATA?

Why is Personal Data used?	What Personal Data is used?	On what legal basis is Personal Data processed by the Data Controller?	How long is Personal Data retained?
<p><b>Creation and management of the Doctolib User Account</b> (creation of the User Account, verification of identity and right to practice of the Healthcare Providers, traceability requirements, etc.)</p>	<p><b>Identification data:</b> Surname, first name, avatar picture (optional), email address, medical registration number (when applicable), medical profession, titles, medical speciality, interests organisation/association, copy of medical ID, driver's licence, passport or ID, organisation specific profile fields, IP address.</p> <p><b>Contact data:</b> Email address, phone number</p>	<p>For creation of the User Account and identity verification:</p> <p>Necessary for the performance of a contract to which the data subject is a party or for the performance of pre-contractual measures taken at the request of the data subject.</p>	<p>For creation of the User Account and identity verification:</p> <p>Duration of the contractual relationship</p> <p>In order to protect itself against any dispute, Doctolib is likely to keep certain information for up to 5 years from the end of the contractual relationship</p> <p>A copy of the identity document is deleted after verification.</p>

<p><b>Creation of a directory and User Profile Forms</b></p>	<p><b>Identity data:</b> Title, surname, first name.</p> <p><b>Professional data:</b> Phone number, email address, avatar picture, medical registration number, interests, medical profession, organisation/association, medical specialty.</p>	<p>Necessary for the performance of a contract to which the data subject is a party or for the performance of pre-contractual measures taken at the request of the data subject or Legitimate interest.</p>	<p>Until deletion request.</p> <p>For information, the processing time for requests to delete Personal Data is a maximum of 30 days. In the event of a complex request, this period may be extended up to 60 days.</p>
<p><b>Provision of information</b> about the Services (new features, Service user guides, new products, etc.).</p>	<p><b>Identification data:</b> Title, surname, first name.</p> <p><b>Contact data:</b> Address, email, phone number.</p>	<p>Legitimate interest</p>	<p>Duration of the contractual relationship.</p>
<p><b>Analysis of the use of the Services and devices</b> (navigation on the Sites, use of the Doctolib Siilo Services, use of the services) for the purposes of monitoring, research, improvement, and personalisation of the Services.</p>	<p><b>Usage and connection information related to the use of the Doctolib Siilo Services:</b> Type of activity, User ID, Installation ID, Web session ID, Client type, Doctolib Siilo version, location on the basis of IP address, Usage language, User agent, number of connections on Doctolib Siilo, device information, number of groups, number of messages sent/received, how many and which days</p>	<p>Legitimate interest</p>	<p>Duration of the contractual relationship.</p> <p>In order to protect itself against any litigation, Doctolib is likely to keep certain information for up to 5 years from its registration.</p> <p>The logs used to ensure the security of the Services are kept for a period of 1 year from their recording.</p>

	<p>online, web app activation and current sessions.</p> <p>Usage and connection information related to the account events: User ID, account created or deleted, type of account (user or group), client type, used language.</p> <p><b>Usage and connection information related to the Doctolib Siilo Messenger:</b> Type of message, timestamp, User/Installation ID sender, type of session (webchat or not), client type, Doctolib Siilo version location on the basis of IP address, group ID destination, destination of message, user ID destination, message ID, topic ID (only applicable during a user message), envelop type, quote, length of (video or voice) call.</p> <p><b>Usage and connection information related to the registration process:</b> step within registration process, status of entered data, client type, Doctolib Siilo version, device model, location on the basis of IP address, User ID (if registration is completed).</p>		
<p><b>Establishment of connections to Doctolib Siilo Messenger (e.g. recommend connections)</b></p>	<p>Phone number</p> <p>Contact phone numbers (phonebook contacts) or address book data</p>	<p>The Data is processed by Siilo as a data controller on the basis of the following legal grounds:</p> <p>User's phone number: Necessary for the performance of a contract to which the data subject is a party or for the</p>	<p>Duration of the contractual relationship.</p>

		<p>implementation of pre-contractual measures taken at the request of the data subject.</p> <p>Contacts' phone numbers: Consent. The User is prompted through a pop-up to indicate whether they agree to Siilo accessing their phone book data.</p>	
<p><b>Prevent and fight against computer fraud</b> (spamming, hacking, DDoS attacks etc.).</p>	<p><b>Usage and connection information related to the use of the Doctolib Siilo Services:</b> Device information.</p> <p>NB: At the request of the judicial authorities, Doctolib can transmit the latest IP addresses collected, so that the Healthcare provider can be identified in cooperation with his Internet service provider.</p>	Legitimate interest	<p>The logs used to ensure the security of the Services are kept for a period of 1 year from when they were recorded.</p> <p>In order to protect itself against any litigation, Doctolib is likely to keep certain information for up to 5 years from its registration.</p>
<p><b>Improvement of Services ; production of statistics ; Data anonymisation</b> e.g.: use of data for product improvement purposes; communication of aggregated statistics.</p>	<p><b>User Account data :</b> <i>Phone number, email address.</i></p> <p><b>Usage and connection data relating to the use of the Services and the Doctolib Siilo Services:</b> Group ID destination (only applicable during a group message), destination of message (user or group), user ID destination (only applicable during a group message), message ID.</p> <p><b>Client type:</b> Type of activity and action, Doctolib Siilo version.</p>	Legitimate interest of Doctolib Siilo as Data Controller	<p>Specific durations according to the data concerned:</p> <p>Duration of the contractual relationship for the management and creation data of the User Account as well as for the data of the customer database</p> <p>or</p> <p>Until a deletion request is received for User Profile data</p> <p>or</p> <p>1 year from their registration for connection and usage data for the Sites, the Doctolib Siilo Services</p>

	<p>Answers to various questions on the health sector or on the care pathway and medical care. Answers to site surveys.</p> <p>Step within registration process, Status of entered data</p> <p><b>Back-end Data:</b> Siilo account ID, location coordinates, city, region and country, email domain</p>		<p>or</p> <p>1 month from sending Doctolib the answers to the questionnaires</p> <p>or</p> <p>Until there is an objection for User Account data</p> <p>or</p> <p>Until there is an objection or a deletion request for prospect data</p>
<p><b>Conduct optional surveys</b> on Doctolib Siilo's Services and their possible developments, analysis of the satisfaction rate (NPS score), "user research" workshops allowing Doctolib Siilo to improve its product, etc.</p>	<p><u>According to the surveys:</u></p> <p><b>Identification data:</b> Last name, first name.</p> <p><b>Contact data: Phone contacts</b> telephone number and email address.</p> <p><b>Professional data: Title</b></p> <p><b>Other:</b> Miscellaneous questions on the health sector or on the course of care and medical care, satisfaction note.</p>	<p>Legitimate interest: in-product surveys</p> <p>Consent: surveys sent by email.</p> <p>Legitimate Interest</p>	<p>The answers to the questionnaires are kept for 1 month after being sent to Doctolib.</p> <p>At the end of this period, the Personal Data is anonymised.</p>
<p><b>Marketing campaigns on social media and third party websites</b></p> <p>- Display of targeted Doctolib advertising campaigns,</p>	<p><b>Identification data:</b> Title, surname, first name.</p> <p><b>Contact data:</b> Email address, telephone number.</p> <p><b>Professional data:</b> Specialization</p>	<p>Legitimate interest</p>	<p>Until opt-out directly managed through the social media and third party websites</p>

<p>- Generation of campaign performance and analysis reports.</p>			
<p><b>Creation and management of a prospect database</b> (Management and optimisation of the prospect database, creation of reports, organisation of events and webinars).</p>	<p><b>Identification data:</b> Title, surname, first name</p> <p><b>Contact data:</b> Telephone number, email address.</p> <p><b>Professional data:</b> Specialization.</p>	<p>Legitimate interest</p>	<p>The earlier of:</p> <ul style="list-style-type: none"> <li>- 3 years from the last contact with the prospect</li> <li>- Until objection or request for deletion.</li> </ul>
<p><b>Creation and management of the customer database</b> (Management and optimisation of the customer database, creation of reports, training of Doctolib support teams, organisation of events, webinars, and collection of testimonials, etc.).</p>	<p><b>Identification data:</b> User ID, title, last name, first name, avatar picture.</p> <p><b>Contact details:</b> Phone number, email. address, phone contacts telephone numbers, findable group name, group description</p> <p><b>Professional data:</b> Specialization, medical registration number, medical profession, interest, organisation/association, photograph of medical ID, driver's licence or passport.</p> <p><b>Account data:</b> Number of contacts, device information, number of groups, organisational role, how many messages sent/received, how many and which days online, web app activation and current sessions, who chats with whom, at what time exactly,</p>	<p>Legitimate interest</p>	<p>Duration of the contractual relationship</p>



	<p>time and duration of VoIP/video calls, message size, which groups are active, group names of private groups, composition of groups</p> <p><b>Other:</b> Responses to surveys.</p>		
<p><b>Customer relationship management</b></p> <p>Management of support requests.</p>	<p><b>Identification data:</b> User ID, surname, first name.</p> <p><b>Professional data: Specialization,</b> organisation/association.</p> <p><b>Account data:</b> content of the support request and further exchanges</p>	<p>Legitimate interest or necessary for the performance of a contract to which the data subject is a party or for the performance of pre-contractual measures taken at the request of the data subject for Doctolib</p>	<p>Duration of the contractual relationship</p> <p>In order to protect itself against any litigation, Doctolib is likely to keep certain information for up to 5 years from its registration</p> <p>30 days for the attachments</p>
<p><b>Information on changes to the Services.</b></p>	<p><b>Identification data:</b> Surname, first name;</p> <p><b>Contact data: Phone</b> number, email address;</p> <p><b>Account data:</b> Subscribed services;</p>	<p><b>For the updates necessary to maintain the compliance of the Services:</b> legal obligation</p> <p><b>For updates not necessary to maintain the compliance of the Services:</b> performance of the contract.</p>	<p>Duration of the contractual relationship.</p>
<p><b>Commercial referencing</b></p> <p>Information to prospects concerning the Services subscribed by Healthcare Providers.</p>	<p><b>Identification data:</b> Surname, first name.</p> <p><b>Professional data:</b> Specialization.</p> <p><b>Account data:</b> Subscribed services.</p>	<p>Legitimate interest</p>	<p>Duration of the contractual relationship or Until opposed.</p>
<p><b>Contract, billing and</b></p>	<p><b>Identification data:</b> first name, surname, address, email, telephone number, customer account number,</p>	<p>Invoicing and collection: Legal obligation (for the Netherlands: art. 52 AWR).</p>	<p>7 years (for the Netherlands).</p>

<p><b>payment management</b></p> <p><b>Invoicing, collection, reporting and statistics.</b></p>	<p>SIRET, VAT number, CoC number (Netherlands).</p> <p><b>Economic and financial data:</b> bank account number, mandate information, reason for rejection of payment, method of payment, payment schedule, PO number.</p>		
<p><b>Management of the records of processing activity.</b></p>	<p><b>Practitioners:</b> first name, surname, address, email, telephone number.</p> <p><b>Legal representative:</b> first name, surname, address, email, telephone number</p> <p><b>DPO:</b> first name, surname, address, email, telephone number.</p>	<p>Legal obligation (art.30.2 GDPR).</p>	<p>Duration of the contractual relationship.</p>
<p><b>Partner relationship management.</b></p>	<p><b>Identification data:</b> first name, surname, telephone number, email address</p> <p><b>Professional data:</b> name of the company, job title</p> <p><b>Economic and financial data:</b> bank account details.</p>	<p>Legitimate interest</p>	<p>During the contractual relationship.</p>

For security reasons, especially to ensure the continuity of its Services, some of your Personal Data may be kept by Doctolib in protected backup files for seven (7) additional days. Indeed, for backup purposes, daily automated “snapshots” are taken that are stored for no more than seven (7) days. These snapshots are encrypted at rest.

Your Personal Data is stored, if applicable, for a longer period of time to comply with Doctolib legal obligations or for the duration of the statute of limitations for litigation purposes.

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## 6. WHO DOES DOCTOLIB SHARE YOUR PERSONAL DATA WITH?

**Internal use:** your Personal Data are processed by employees of Doctolib Group, within the limits of their respective attributions and exclusively to achieve the purposes of this Policy.

### **Recipients and data processors:**

**Hosting:** Personal health data is hosted by Amazon Web Services, which is specifically certified for this purpose according to European standards (French certification "Health Data Services" - HDS). To increase the security of all our services, we have decided to host all Personal Data of our customers and Healthcare Providers, regardless of whether or not it qualifies as Health Data.

**Data processors:** Doctolib uses the services provided by several specialised service providers, the list of which is presented in Appendix 1.

**Cross-border transfer:** In order to provide its Services, Doctolib may use service providers located outside the European Union. If the data are transferred to a third country in which the legislation has not been recognised as offering an adequate level of protection for Personal Data, Doctolib ensures that the appropriate measures are put in place in accordance with the Data Protection Act and articles 46, paragraphs 2 and 3 as well as article 49, paragraph 1 of the GDPR, notably, when necessary so that contractual clauses of the European Union or equivalent ad hoc clauses are integrated into the contract concluded between Doctolib and the providers.

**Other recipients:** In order to comply with legal requirements, Doctolib may transfer your Personal Data to public or judicial authorities.

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## 7. WHAT RIGHTS DO YOU HAVE OVER YOUR PERSONAL DATA?

In accordance with GDPR, you have the following rights over your Personal Data:

**Right of access** (article 15 GDPR): you may at any time access your personal information held by Doctolib.

**Right to rectification** (article 16 GDPR), and right to erasure (article 17 GDPR): you may request the modification or deletion of your Personal Data.

**Right to restriction of processing** (Article 18 GDPR): you have the right to restrict the processing carried out on your Personal Data only when one of the following situations arises: (i) when you dispute the accuracy of your data, (ii) when you believe that the processing of your Personal Data is unlawful, or (iii) when you need this restriction for the recognition, exercise or defence of your rights in court.

**Right to data portability** (article 20 GDPR): you have the option of requesting the recovery of the Personal Data that you provided to Doctolib, for personal use or to transmit this data to a third party of your choice. This applies only when this Personal Data is subject to an automated processing based on your consent or if the processing is necessary for the performance of a contract to which you are a party.

**Right to object** (article 21 GDPR): you may oppose the processing of your Personal Data for direct marketing purposes and/or may oppose the processing carried out on the basis of Doctolib's legitimate interest.

**Right to define the fate of your Personal Data** after death and to choose to whom Doctolib should communicate (or not) your Personal Data to a third party that you would have previously designated (find out more). As soon as Doctolib learns about your death and in the absence of any instructions from him, Doctolib undertakes to destroy your Personal Data, unless the retention of this data is deemed necessary for probative purposes or to meet a legal obligation (such as keeping the patient record).

You also have the right to lodge a complaint with a supervisory authority, and particularly with your national DPA.

For more information or to exercise your rights, you can contact Doctolib in writing at the following address: Siilo [Holding B.V, Privacy Department, Keizergracht 585, 1017 DR Amsterdam, Netherlands](#) or by email at [privacy@Siilo.com](mailto:privacy@Siilo.com). In this case, you must indicate which Personal Data you would like Doctolib to correct, update or delete, by specifically identifying yourself with a copy of an identity document (identity card or passport) or any other element allowing you to prove your identity.

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## 8. HOW DOES DOCTOLIB PROTECT YOUR PERSONAL DATA?

Doctolib implements the appropriate technical and organisational measures related to security in accordance with the provisions of the GDPR, and aims at guaranteeing an appropriate level of security in the face of the risks presented by the Processing of your Personal Data. To assess the appropriate level of security, Doctolib will consider the risks that may result from the accidental or unlawful destruction, corruption, loss, modification, unauthorised disclosure or access to Personal Data that may be transmitted, stored or otherwise processed, in accordance with the provisions of article 32 of the GDPR.

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## 9. WHAT ABOUT SOCIAL MEDIA AND THIRD-PARTY WEBSITES?

### [Link to social media](#)

You have the option of clicking on the icons dedicated to the social media X , Facebook and LinkedIn, appearing on the Sites or on the Doctolib Siilo App. By clicking on these icons, you will be redirected to external websites.

Social media makes it possible to improve the user-friendliness of the Sites or the Doctolib Siilo App and help promote them through sharing. Video sharing services make it possible to enrich the Sites or the Doctolib Siilo App with video content and increase their visibility.

When you click on these icons, Doctolib does not collect or process your data nor are they shared by the user via X, Facebook and LinkedIn. . These are only links sending you back to these social media when you click on the icons. When you are referred to social media, your interactions and information collected by the social media are subject to the confidentiality settings defined by you with each social media:

## 10. WHO IS DOCTOLIB FOR? IS DOCTOLIB ALSO FOR MINORS?

The Sites and the Doctolib Siilo App are intended for adults capable of taking on the obligations in accordance with the legislation of the country in which you are located.

The use of the Doctolib Siilo App is reserved for Healthcare Providers. As a Healthcare Provider you acknowledge that you are acting within the scope of your professional activity carried out in your country and undertake to verify that each Healthcare Provider in your organisation is also acting within the scope of their professional activity carried out in your country.

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## 11. WHAT ARE THE TERMS AND CONDITIONS OF THIS POLICY?

Doctolib may modify, complete, or update this Policy in order to take into account any legal, regulatory, jurisprudential and/or technical developments.

In the event of significant modifications (relating to the purposes of processing, the Personal Data collected, the exercise of rights, the transfer of Personal Data) to the terms of this Policy, Doctolib undertakes to inform you by any written means at least fifteen (15) days prior to their effective date.

Any access of and use of the Doctolib Siilo Services after this period will be subject to the terms of the new Policy.

You are informed that the only authentic version of the Policy is the one found online, which you acknowledge without restriction.

You are required to refer to the online version of the Policy on the date of your access and on each use of the Services.

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## 12. HOW CAN YOU CONTACT DOCTOLIB FOR PRIVACY RELATED QUESTIONS?

For any questions or complaints concerning Doctolib's compliance with this Policy, or for any recommendations or comments aimed at improving the quality of this Policy, you can use the following contact details.

You can contact Doctolib :

- in writing at the following address: Siilo Holding B.V., Privacy Department, Keizergracht 585, 1017 DR Amsterdam, Netherlands or
- by email at [privacy@siilo.com](mailto:privacy@siilo.com)

## Appendix: List of data processors

### Hosting:

Data Processor	Country of origin	Location of servers	Category of service concerned	Type of task performed
<b>AWS EMEA</b>	Parent company: USA Contracting entity: Luxemburg	European Union (EU)	Hosting	Hosting of data for Doctolib Siilo Services

### Support:

Data Processor	Country of origin	Location of servers	Category of service concerned	Type of task performed
<b>Salesforce</b>	Parent company: USA Contracting entity: France	France	User support	Manage customer's requests sent through the contact form on the website.
<b>ZenDesk</b>	USA	USA, EUEE or Asia	Ticketing System	Users may provide feedback via the Doctolib Siilo Messenger App. Due to the high volume of these interactions, Doctolib has a ticketing system, using a software called ZenDesk, to keep track of employee-user communication exchanges.

### Telecom:

Data Processor	Country of origin	Location of servers	Category of service concerned	Type of task performed
<b>Braze</b>	USA	EU	Telecoms	Allows Doctolib to manage its communication campaigns with Users/Subscribers and to assess the impact of its campaigns in order to improve their content.
<b>Twilio</b>	USA	Ireland	VOIP calls	Twilio is used to provide Doctolib's in-app VOIP (calling via internet) and video call functionality.
<b>Mailjet</b>	France	Germany & Belgium	Telecom	Send transactional emails to Doctolib Siilo users and potential Doctolib Siilo users

				when organisations have provided their email address to invite them and to people entering their information in the Prima subscription form on the website.
<b>CM.com</b>	Netherlands	Netherlands	Telecom	Send SMSs to users with a code to confirm that they indeed have access to the device connected to a specific number.

### **Analytics:**

<b>Data processor</b>	<b>Provider's country of origin</b>	<b>Location of servers</b>	<b>Category of service concerned</b>	<b>Type of task performed</b>
Adjust	USA	USA	Analytical tool	Help Doctolib to track instals/registrations of/on the App.

### **Marketing:**

<b>Data processor</b>	<b>Provider's country of origin</b>	<b>Location of servers</b>	<b>Category of service concerned</b>	<b>Type of task performed</b>
<b>Typeform</b>	Spain	EU	Marketing	Helps Doctolib to create surveys for Users/Subscribers
<b>Salesforce</b>	Parent company: USA Contracting entity: France	France	CRM tool	Help Doctolib with its commercial prospecting