

FORCE HT CUSTOMER'S CLIENT'S PRIVACY POLICY

APPENDIX 5

Thank you for choosing us, and a special thanks for taking the time to read through this Personal Data Policy thoroughly. We would like to begin with a summary explaining why we have created this policy. Our fundamental objectives are to

- Give a brief introduction to personal data and FORCE HT and its users' responsibilities to create a well-functioning and safe Product and experience.
- Explain why we handle certain kinds of personal information
- Ensure that you understand what information we gather and what we do with this information
- Show you how we work to protect your rights and your integrity.

Our goal with this policy is that you, after having read it, will feel secure that your integrity is respected and that your personal data is treated correctly. Therefore we also work continuously to ensure that our treatment of personal data complies in its entirety with current legislation, especially the General Data Protection Regulation (GDPR).

Unless otherwise defined herein, all terms beginning with a capital letter that are defined in the User Agreement (Appendix 3) shall have the same meanings herein as therein unless expressly stated otherwise.

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.

This Privacy Policy shall in the first instance apply to individuals who are users of our Platform and from whom we collect and process personal data (also referred to as our "**Users**" or "**Data Subjects**"). Herein we are specifically referring to the end-users of our customers, as in the clients of the clinics that have chosen to use our products. Different parts of this Privacy Policy may also be relevant to you depending on your relationship with FORCE HT. All in all, this policy is relevant for persons who

- are users of our products and services
- visit our website or our social media channels
- otherwise communicate with us, for example through our customer service

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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. Force HT acts as Data Controller for the collection, temporary storage, transfer, and deletion of patient photos uploaded through its services, including the Photo to 3D Add-On. The Clinic remains Data Controller for its use of the resulting 3D models in patient consultations.

A **Data Controller** is a legal person or other entity that determines the purpose and means for the processing of personal data. A corporation is a Data Controller regarding personal data it has for its benefit concerning its employees, customers, partners, users, and others.

We, FORCE HT AB (company reg. no. 559413-1756) are the Data Controller and therefore accountable by applicable legislation, for the processing that occurs with your data, within the scope of our services.

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

2.1 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, whichever 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 address. 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 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.

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2.2 Information transferred to the Clinic through uploading photos to Clinic branded websites hosted by Force HT

The Force HT Photo to 3D Add-On enables clinics to integrate photo-based patient consultations into the Clinic Platform. This add-on allows patients to upload photos via clinic-branded websites hosted by Force HT. These photos are first stored on servers used by Force HT within the EU/EEA. Upon uploading the photos, 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 address. Immediately after being sent, the e-mail is automatically deleted from the e-mailing service. Once every 24 hours, Force HT securely transmits the photos to a contracted third-party technology provider (acting as Force HT's data processor) for conversion into 3D models.

Processing by the technology provider takes place entirely within the EU/EEA. The provider does not store patient photos or 3D models on its systems. Photos are accessed only transiently for analysis and processing, after which they are deleted immediately. The provider retains only anonymised technical metadata (e.g., landmark points, processing logs), which cannot be linked to an individual or used to reconstruct a photo or model. The resulting 3D models are returned to Force HT servers in the EU/EEA and are then available for clinics to use in consultations with patients. In parallel, patient photos are deleted from Force HT servers.

Force HT is responsible for handling patient photos securely during upload, temporary storage, transmission, and deletion from its servers. The contracted technology provider acts as a data processor to Force HT, processing photos solely for the purpose of generating 3D models. Clinics remain data controllers for their patients' information and are responsible for using the resulting 3D models in line with applicable law and Appendix 4: Customer Privacy Policy.

Key safeguards:

- a) Patient photos are encrypted in transit between Force HT and the technology provider.
- b) Patient photos are deleted immediately after processing.
- c) Only anonymised technical metadata is retained by the technology provider.
- d) Force HT ensures that storage and handling of photos and models take place on servers within the EU/EEA.
- e) Patients can exercise their data protection rights primarily through their clinic, but may also contact Force HT regarding the handling of uploaded photos.

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

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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.

What is personal data?

Personal data consists of all information that, directly, or indirectly, together with other information, can be connected to a living (physical) person. A non-exhaustive list with examples of personal data consists of, among others:

- Name
- Personal ID number
- Email-address

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- IP-address
- Phone number

The processing of personal data includes every action connected to the use of the personal data, regardless of whether such an action is performed automatically or not. This means that the following actions, among others, are included:

- Collection
- Registration
- Use
- Alteration
- Storage
- Disclosure by transmission
- Deletion

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

Processing and purpose	Lawfulness	Storage limitation
To ensure safe and effective use of our website. 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).	Consent.	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. By deleting cookies or turning off the function in your browser, you can ensure that the Company no longer processes the information.
To enable the functionality of the Force HT mobile app 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: - Device information such as device OS, model, and configuration settings - In-app activity data such as ARDK features used (e.g meshing) - Log information such as unique user IDs as well as performance and other diagnostic data	Agreement, legal obligation, and legitimate interests.	Our third party supplier's privacy policy can be reviewed at any time at https://nianticlabs.com/privacy

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Processing and purpose	Lawfulness	Storage limitation
- Geospatial information derived from the device camera, which is not persistently stored		
To enable creation of 3D models based on patient photos Patients upload photos via clinic-branded websites hosted by Force HT. Photos are temporarily stored on Force HT servers in the EU/EEA and transmitted once per 24h to a contracted third-party processor for 3D model generation. The processor accesses photos only transiently, deletes them immediately after processing, and retains only anonymised technical metadata. The generated 3D models are returned to Force HT servers and made available to clinics for consultations. In parallel, the patient photos are deleted from Force HT servers.	Agreement (to deliver consultation service) and legitimate interests (to ensure secure and efficient processing)	Patient photos uploaded via the Photo to 3D Add-On are deleted from Force HT's servers once the 3D models have been generated. The resulting 3D models may be retained by Force HT and the Clinic for consultation purposes, and for no longer than 12 months after termination of your agreement with the Clinic.

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;

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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. In other words, you understand that for you to be able to use our products, as a client of a Clinic, certain personal information needs to be accessed and processed.

Why are we allowed to process personal data?

For it to be permissible for us to process personal data there must always be support for said treatment within the GDPR, a so-called lawful basis. Such lawful basis may include:

- **Consent** from the Data Subject
- That the processing of personal data is necessary to **fulfill the terms of an agreement** with the Data Subject, for example about the use of the Platform (i.e., Terms of Use).
- **Fulfilling a legal obligation**, for example storing certain information due to legislation regarding certain accounting standards and practices. This could also be the case when handling opt-out settings requests concerning your rights as a Data Subject by the GDPR.
- A weighing of interests when we have a **legitimate interest** in using your data, for example for statistical purposes and to market our services and prevent fraud.

The same personal data may be processed both when giving you support (**fulfilling the terms of an agreement**) as well as based on your **consent** or when **fulfilling another legal obligation**. This means, for example, that even though you may revoke your consent and the processing based on said consent ceases, that specific personal data may remain with us for separate reasons. All in all, as long as FORCE HT has a lawful basis for its processing of your data, FORCE HT reserves the right to proceed with said processing.

Personal data is stored for up to 12 months after the termination of your primary agreement with us.

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.

FORCE HT takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data. The Data processing is carried out using

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computers and/or IT-enabled tools, following organizational procedures and modes strictly related to the purposes indicated in our Privacy Policy and Terms of Use.

The Data concerning the User is collected to allow FORCE HT to provide its products and services, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Registration and authentication, Hosting and backend infrastructure, Managing data collection and online surveys, Infrastructure monitoring, User database management, Handling payments, Managing contacts and sending messages, Traffic optimization and distribution, Tag Management, Analytics and Displaying content from external platforms.

When you access or use our products, we may make available services from one or more third parties ("Third-Party Platforms"). Our products may support Third-Party Platforms, including Facebook, Google, Twitch, and Discord if necessary for creating user accounts. Any use of Third-Party Platforms to create and access your user account is subject to the terms and conditions and privacy policies of such third parties ("Third-Party Terms"). Please note that when using our products, you should not submit any sensitive or confidential information with the use of applications utilizing generative artificial intelligence (generative AI). As FORCE HT may utilize platforms such as those available through OpenAI, certain data may be submitted through servers based outside of the EU. However these third-party services are not involved in the processing of patient photos uploaded via the Photo to 3D Add-On.

We reserve the right to make amendments to this Privacy Policy from time to time. The date for the latest amendment is stated at the end of this Privacy Policy. If we make any amendments to the Privacy Policy, we will publish these amendments on our website. You are therefore recommended to read this Privacy Policy regularly to view any potential amendments.

6. Complaint

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. However, we would suggest that you first direct any issues directly to the Clinic in question and if the matter has not been resolved please feel free to inform us so that we may handle the matter accordingly.

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: info@forceht.com

Please include your name, address, email, telephone number, and personal ID number in the letter. Please also enclose a copy of your ID. A reply will be sent to your address as stated in the National Population Register.