

SALUSMO APP – PRIVACY NOTICE

Version 1.0; effective from July 15, 2026

This Privacy Notice explains how we, MotionScan Ltd. (registered seat: H-4300 Nyirbator, Domb utca 1., Hungary; company registration number: 15-09-090243; email: privacy@salusmo.com; “we”, “us”, or “our”) collect and process your personal data as a data controller when you use our Salusmo consumer wellness app (“App”). This Privacy Notice is separate from and to be read together with the App’s Terms of Use.

This Privacy Notice covers our data processing in connection with the App and it relates to you if you are either a user of the App or an emergency contact of an App user.

It does not cover Salusmo Pro or any other product, and it does not cover the data processing related to our website.

1. The personal data we collect

If you are a user, then depending on how you use the App, we collect the following categories of data:

- **Account and Identity Data:** your name and email, or the identifier from your Google or Apple account, and your login credentials.
- **Your Profile Picture:** if you register with Google Sign-in, your profile picture may be uploaded into your account. That profile picture must comply with the App’s Terms of Use.
- **Subscription and Billing Data:** your Plan/Trial and the subscription and payment status confirmed to us by Apple.
- **Health Data you provide:** information you choose to provide through the app to enable personalized movement pattern analysis, including age, gender, medical history, current medical conditions.
- **Movement and Sensor Data:** sensor data collected from your Apple Watch and iPhone during monitoring and self-tests used to assess movement patterns.
- **Analysis Results:** the outputs generated by the App’s analysis of your data, including your movement-quality status, wellness risk factors, trends and reports. Because these results relate to your physical condition and health status, they are treated as health data.
- **Location Data:** your last known location, which may be shared with contacts you designate when the App sends a notification, but– only if you switch this on.
- **Emergency Contact Details:** the contact information of the individuals you set as emergency contacts. Notifications are sent to these contacts when initiated by you or when the App detects a potential emergency (e.g., lack of responsiveness) and does not receive confirmation that you feel well.
- **Customer Service Data:** what you send us when you give feedback, contact support or make a complaint.

- **Telemetry and Analytics Data:** technical, troubleshooting, and usage information about how the App performs and is used. This data does not include health data. We anonymize such data promptly after collection.

If you are an Emergency Contact: we process only the emergency contact information that a user has provided about you when designating you as an Emergency Contact within the App. We use this information solely to enable notifications and communications related to emergency situations and the App's safety features.

If you do not provide certain data, you may not be able to access certain features of the App.

2. For what purposes and on what legal basis we process your data

If you are a user, we process your personal data to:

- enable you to register for the App, manage your account and subscription plan or trial period, and send you notifications relating to the App and its Terms of Use;
- comply with our tax, accounting, and billing obligations,
- Provide, operate, and support the App and its features,
- maintain the security of the App and enforce its Terms of Use,
- Maintain, troubleshoot and improve the performance, functionality, and quality of the App,
- operate customer support and respond to your inquiries, feedback and complaints,
- anonymize or pseudonymize your data and use it for research and product improvement purposes, where you have opted in,
- resolve any arising disputes, and
- send you newsletters, updates, and other marketing communications if you subscribed to them.

The exact content of our data processing depends on your subscription plan or trial. Please also read the App's Terms of Use and look for our in-app communication when you use the App.

If you are an Emergency Contact set by a user of the App: we process your personal data solely to enable emergency-related communications, including notifying you when the App detects a potential emergency involving the user and enabling the user to call you through the App. We first contact you to ask whether we may set you as an Emergency Contact based on our legitimate interest. Thereafter, we only process your personal data if you provide us with your consent to do so.

We may process your personal data based on the following legal bases: performance of the App's Terms of Use, compliance with legal obligations, our legitimate interest(s), or your consent.

We process your health data only based on your explicit consent or, upon necessity, to establish, exercise or defend legal claims.

To learn more about each purpose of and the specific underlying legal basis for our data processing, please read Annex 1 to this Privacy Notice at its end.

3. How long we keep your data

We keep your personal data only for as long as necessary to fulfil the purposes described above, after which we delete or anonymize it.

We retain non-anonymized movement and sensor data and analysis results for 30 days or until the storage space allocated to your account (5 GB) is full, whichever occurs first. .

We process your subscription and billing data for accounting purposes for eight years, in accordance with applicable law.

We keep records relating to your complaints until the complaint is resolved and for an additional three years thereafter, in accordance with applicable laws.

We use your data to send newsletters and other marketing communications until you unsubscribe.

We process all other personal data for the time we provide you with the App and, thereafter, until the applicable statutory limitation period for related legal claims expires, which is generally five years.

We may retain and use anonymized data indefinitely, as such data can no longer be used to identify you.

4. Storage and access on your device

We store and read data on your Apple Watch and iPhone only as far as needed to provide the service you have asked for. For anything beyond what is technically necessary, we ask for your prior consent. Data that is created on your device and never sent to us is not affected by this.

After we obtain your personal data, we may also process it for purposes based on our legitimate interest, such as , maintaining and improving the quality of the App, provided that such purposes are compatible with the purposes for which we initially collected your personal data. This does not apply to health data. We process health data only on the basis of your explicit consent or another legal basis permitted under applicable law.

5. Automated analysis and our AI

An artificial-intelligence system automatically analyzes your movement based on sensor and health data to assess the quality and patterns of your movement and to generate the status, trends and notifications you see in the App. The system was trained on data collected from a range of individuals, and its sensitivity is adjusted using the information you enter.

In plain terms: the system compares patterns in your movement over time and against its trained model, taking the information you enter into account, and produces a movement-quality status and notifications about changes or unevenness it observes. Because it relies on consumer sensors, an internet connection and the information you enter, its results can be wrong, late, incomplete or unavailable. Salusmo is a wellness tool and not a medical device. It does not provide diagnoses or medical advice. The App's analyses, insights, and notifications are provided for informational purposes only and must not be relied upon as a substitute for professional medical advice and medical care.

The App provides you with information; it does not itself make any decision producing legal effects or similarly significantly affecting you.

6. Emergency contacts

If you are a user of the App, you may designate one or more emergency contacts to receive notifications by email, push notification or text messages (SMS), according to your settings. These notifications may be sent when the App detects a significant change in your movement patterns. Emergency contacts can also view your current status through the App if you enable such a feature. Before sending a notification, the App will take pre-emptive steps to verify your wellbeing, such as asking you to confirm you are well. If you have enabled location sharing, your last known location may also be shared with your emergency contacts when a notification is sent.

Before you add someone's details, you must ask their prior permission.

7. Who we share your data with

We do not sell your personal data and we do not share it with third parties for their own purposes. We share it only as follows:

- **Apple:** for app distribution and to take payment and confirm your subscription. Apple acts under its own terms for the payment. If you use your Apple account to create your Salusmo account, Apple also receives relevant data to ensure your account creation.
- **Google:** if you use your Google account to create your Salusmo account, Google receives data to ensure your account creation.
- **Service providers acting on our behalf (processors):** we engage trusted third-party service providers to support the operation, delivery, maintenance, and improvement of the App. A list of our current service providers are set out in Annex 2 to this Privacy Notice.
- **Your designated emergency contacts who can view your current status through the App if you enable that feature.**
- **Researchers: we may provide them** only with irreversibly anonymised data, and only if you have given your separate consent.
- **Advisers and authorities:** our professional advisers, and public authorities or courts where we are legally required to disclose data or need to establish or defend legal claims.

8. International data transfers

Health data and motion measurement data collected through the App are processed and stored in the region associated with the User's account. For Users whose accounts are associated with the European Economic Area ("EEA"), health data and motion measurement data are processed and stored exclusively within the EEA and are not transferred outside the EEA.

within the European Economic Area (“EEA”) when uploaded from a location within the EEA. We do not transfer such data outside the EEA. In case the user is located in the United States (US) health data and motion measurement data is processed in the US.

Service providers acting on our behalf in relation to the provision of the App may process other categories of personal data, e.g. for account management, authentication, communications, and similar operational purposes, in countries outside of the EEA. These countries include the following: United States, Israel, Singapore, United Kingdom, Chile, Taiwan, and Japan.

Furthermore, the locations of Google’s data centers are available here: <https://datacenters.google/locations/>

In relation to some of the countries above, such as the United Kingdom, Japan and the United States (if the relevant organization participates in the so-called EU-US Data Privacy Framework), the European Commission (“**EC**”) has adopted an adequacy decision in which the EC established that the countries offer an adequate level of data protection.

For all other non-EEA countries, we ensure an appropriate level of data protection by concluding standard contractual clauses, adopted by the EC, and ensuring that our service providers take appropriate measures to protect your personal data.

If you would like to receive a copy of these standard contractual clauses, please contact us at info@salusmo.com.

9. How we protect your data

We use technical and organizational measures proportionate to the risk, such as applying encryption, using secure servers and equipment, and storing your measurement and analysis data separately from your identity data. Access is limited to the staff and contracted specialists who need it – our medical and software/AI developers and support staff – each bound by confidentiality.

10. Your rights

As a data subject, you have the following rights:

- **Right to withdraw consent:** if we process your personal data based on your consent, you have the right to withdraw your consent at any time, without giving reason. In such cases, we will no longer process those of your personal data which we previously processed based on your consent, unless we have another legal basis to do so. The withdrawal of consent does not affect the lawfulness of the data processing based on consent prior to its withdrawal.
- **Right of access:** you can request confirmation of whether we process your personal data, access information about our data processing and obtain a copy of your personal data on request. The first copy of the relevant data set is free of charge. For more copies, we may charge a reasonable fee based on administrative costs.
- **Right to rectification:** you can request us to change incorrect or incomplete personal data.

- **Right to erasure (right to be forgotten):** in certain circumstances, you have the right to request that we delete your personal data, for example where the personal data is no longer necessary for the purposes for which it was collected or processed.
- **Right to restrict processing:** in some cases, you can request us to restrict our processing of your personal data. In these cases, we may only process the restricted data for certain limited purposes set out by law.
- **Right to data portability:** if the legal basis of our data processing is your consent or the performance of a contract between you and us, or taking steps at your request prior to entering into such contract, you have right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us.
- **Right to object:** if we process your personal data based on the legitimate interest of ours or a third party, you have the right to object to our processing of your personal data on grounds relating to your particular situation. In such a case, we will no longer process your personal data unless we have compelling legitimate grounds for the data processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

Please note that your above rights may be subject to restrictions under applicable law; for example, you cannot always successfully request the deletion of your personal data.

Furthermore, if your request is unfounded or excessive (e.g., because of its repetitive nature), we may refuse to comply with your request or charge a reasonable fee.

In order to effectively remedy your complaints, please email us at info@salusmo.com.

If you believe your rights have been infringed, you have the following options:

1. You can lodge a complaint with the data protection authority

You have the right to lodge a complaint with the data protection supervisory authority in the country of your habitual residence, place of work, or where you believe an infringement of applicable data protection law has occurred. If you reside in Hungary you may contact the Hungarian National Authority for Data Protection and Freedom of Information, which is the lead supervisory authority for MotionScan Ltd. (Address: 1055 Budapest, Falk Miksa utca 9-11., Hungary; email: ugyfelszolgalat@naih.hu; website: <http://naih.hu>). The contact details of other data protection authorities in the EEA are available here: https://www.edpb.europa.eu/about-edpb/about-edpb/members_en

2. You may file a civil lawsuit in court

You may also bring a civil action against us, regardless of your complaint submitted to the data protection authority.

In order to effectively remedy your complaints, please always contact us first.

11. Changes to this Privacy Notice

From time to time, we may update this Privacy Notice to reflect our data processing activities accurately and comply with applicable laws. If we make changes to this Privacy Notice, we will publish the updated version in the App and at salusmo.com. Where a change is material,

we will actively bring it to your attention (for example by email or an in-app message dedicated to the change).

Annex 1 – The purposes and legal bases of our data processing

Purpose(s)	Data categories	Legal basis
Registration and account management, notifications important to the App's Terms of Use	Account and Identity Data Your Profile Picture Subscription and Billing Data	Performance of the Terms of Use [Article 6 (1) b) GDPR]. In case of your profile picture, your consent [Article 6 (1) a) GDPR].
Billing	Account and Identity Data Subscription and Billing Data	Compliance with our legal obligations [Article 6 (1) c) GDPR] under Act C of 2000 on Accounting under Hungarian law.
Providing you with the App's features	Account and Identity Data Subscription and Billing Data Health Data you provide Movement and Sensor Data Analysis Results Location Data Emergency Contact Details	Performance of the Terms of Use [Article 6 (1) b) GDPR]. For Location Data, your consent [Article 6 (1) a) GDPR]. For health data, your explicit consent [Article 9 (2) a) GDPR].
Maintaining the security of the App and enforcing its Terms of Use	Telemetry and Analytics Data	Our legitimate interest in ensuring the App's security and enforcing the Terms of Use [Article 6 (1) f) GDPR].
Maintaining and improving the quality of the App , based on - Telemetry and Analytics Data; - data relating to your health (optional); - your feedback (optional).	Telemetry and Analytics Data Customer Service Data Health Data you provide (optional) Movement and Sensor Data (optional) Analysis Results (optional)	Our legitimate interest in maintaining and improving the App [Article 6 (1) f) GDPR]. For your feedback, your consent [Article 6 (1) a) GDPR]. For health data, your explicit consent [Article 9 (2) a) GDPR].
Operating customer services	Account and Identity Data Subscription and Billing Data Customer Service Data	Our legitimate interest in managing customer relations and improving the App [Article 6 (1) f) GDPR]. Compliance with our consumer-law obligation to handle complaints and retain records [Article 6 (1) c) GDPR].

Purpose(s)	Data categories	Legal basis
		Any health data you include (depending on the given case): establishment, exercise or defense of legal claims [Article 9 (2) f) GDPR]; or your explicit consent [Article 9 (2) a) GDPR].
Anonymizing data for research – this may include sharing with external researchers (optional)	Data used for providing you with the App's features	Your explicit consent [Article 6 (1) a) and Article 9 (2) a) GDPR]. Once irreversibly anonymized, the data is no longer personal data and is outside the GDPR.
Settle any arising dispute	Personal data relevant to the dispute.	Our legitimate interest in establishing, exercising or defending legal claims [Article 6 (1) f) and Article 9 (2) f) GDPR].
Newsletters (optional)	Your name and email address	Your consent [Article 6 (1) a) GDPR].
Processing your data as an emergency contact	Emergency Contact Details	When we send you an email that a user designated you as an emergency contact and we ask for your consent, we rely on our legitimate interest to enable our users to designate emergency contacts [Article 6 (1) f) GDPR]. If you accept the role of an emergency contact, your consent [Article 6 (1) a) GDPR].

Annex 2 – the service providers we engage as processors

Name	Function	Contact details (if you want to contact them directly instead of through us)
Apple, Inc.	iOS push notifications, in-app subscriptions and payments, transaction verification, and Sign in with Apple authentication	Privacy Policy: https://www.apple.com/legal/privacy/
Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland)	Helps us obtain and analyze crash diagnostics, error reports, and application performance data	Privacy Help Center: https://support.google.com/policies/answer/9581826?p=privpol_privts&visit_id=639160684649218891-3086656016&rd=1 Privacy Policy: https://policies.google.com/privacy
Microsoft Corporation (One Microsoft Way, Redmond, Washington 98052; United States) and Microsoft Ireland Operations Limited (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland)	Help us to store and provide an environment to analyze motion data	Privacy Support Requests: https://www.microsoft.com/hu-hu/privacy/privacy-support-requests Privacy Statement: https://www.microsoft.com/en-us/privacy/privacystatement
Redis	Caching and message transport	Privacy Policy: https://redis.io/legal/privacy-policy/
Twilio Ireland Limited (78 Sir John Rogerson's Quay, Dublin 2 D02 R296, Ireland) and Twilio Inc. (101 Spear Street, 5th Floor San Francisco CA 94105; United States)	Help us to send notifications in relation to your account and the App as well as newsletters.	Email: privacy@twilio.com Privacy Notice: https://www.twilio.com/en-us/legal/privacy