

Privacy Policy

12/09/2025

Your usage of the HOLIVIA Platform, the Services provided by HOLIVIA and by each selected Practitioner involve the processing of your personal data and in particular data relating to your health (“your Data”).

Take a few minutes to review this document, we'll explain everything to you !

Two data controllers

On the HOLIVIA Platform, your data is processed by HOLIVIA as part of the services it provides to you.

They may also be processed by each practitioner you decide to work with, in the context of the services they provide you.

The processing of your data is necessary for the operation of these services. Otherwise, you will not be able to create a personal account via the HOLIVIA Platform or use these services.

THE HOLIVIA PLATFORM DOES NOT ALLOW YOU TO BENEFIT FROM A MEDICAL CARE, FROM A TELECONSULTATION OR TELECARE. IF YOU HAVE ANY DOUBTS, PLEASE CONSULT YOUR REGULAR DOCTOR. THE HOLIVIA PLATFORM DOES NOT PROVIDE ANY EMERGENCY SUPPORT. FOR ALL EMERGENCY PLEASE CONTACT EMERGENCY SERVICES BY DIALING THE ADEQUATE NUMBER DEPENDING ON YOUR COUNTRY.

For any questions: a data protection officer

HOLIVIA has appointed a data protection officer to ensure compliance with the regulations and rules described in this privacy policy and ensure a proper execution of your rights.

HOLIVIA's data protection is a certified DPO. For any questions about the processing of your data, please contact the following email address: dpo@holivia.fr.

Why and on what legal basis are your data processed and who has access to it ?

✓ Your Data processed by HOLIVIA

The table below allows you to understand all the uses we make of your data and the legal basis for these uses, that is to say what authorizes us according to the law to process your data.

It also allows us to know if data relating to your physical or mental health is used and why the legal basis under which your data is processed.

Finally, it identifies the recipients of your data, that is to say the restrictive list of people or legal entities to whom your data can be transferred and communicated.

Purpose	Legal basis – (Article 6 GDPR)	Processing health data?	Data recipients
Management of users' personal accounts	Execution of the General Conditions of Use – (Art. 6, 1, b GDPR)	<p>Yes: Self-declared state of overall psychological health (stress, sleep, self-confidence, accomplishment at work, meaning, relationships, self-esteem, mental load) Psychological support needs</p> <p>Explicit consent – (Art. 9, 2, a GDPR)</p>	<p>Selected practitioners; Staff members of authorized technical service providers (technical account management); Authorized HOLIVIA staff members Host</p>
Production of aggregated and anonymized statistics	<p>Allow HOLIVIA to improve its services and its customers to monitor the execution of the contract and usefully prevent psychosocial risks in their organisations.</p> <p>Legitimate interest - Art. 6, 1, f GDPR</p>	No	<p>Staff members of authorized technical service providers; Authorized HOLIVIA staff members; Third-party financiers/Customers (aggregated and anonymized statistics for monthly reporting)</p>
Sending welcome and engagement emails after account creation	<p>Legitimate interest: HOLIVIA's interest in supporting users in the use of the platform - Art. 6, 1, f GDPR</p>	No	<p>Staff members of authorized technical service providers; Authorized HOLIVIA staff members</p>

✓ Your Data processed by each selected Practitioner

Purpose	Legal basis - Article 6 GDPR	Processing health data?	Data recipients
Video-call sessions offered to Users	Consent – (Art. 6, 1, a GDPR)	Yes Explicit consent - Art. 9, 2, a GDPR	Selected practitioners; Staff members of authorized technical service providers (technical account management); Authorized HOLIVIA staff members.
Management of the appointment booking service	Legitimate interest of practitioners to organize their agenda – (Art. 6, 1, f RGPD)	Yes Explicit consent - Art. 9, 2, a GDPR	Practitioner offering the appointment making service; Staff members of authorized technical service providers (technical account management); Authorized HOLIVIA staff members.
Management of payment for Services provided by the Practitioner to Beneficiary Users	Execution of the general conditions of sale – (Art. 6, 1, b GDPR)	Non	Payment system (Stripe). HOLIVIA does not access this information.

Please note that HOLIVIA may produce and publicly disseminate statistics with unconditional respect for your anonymity, that is to say aggregated and non-individualized data, with a strict statistical measurement objective and without any possibility of directly or indirectly identifying you.

Please note that your data will also be subject to studies, research and evaluations **of public interest**, for the purposes of improving knowledge and patient care, and after the execution of all formalities required with the data protection authority when applicable.

To this end, please note that for each study, research or evaluation that could be conducted using your Data, you will be kept informed and will have the right to withdraw.

HOLIVIA guarantees that your data will not be transmitted to any unauthorized third party, without your explicit prior consent.

Focus on your consent

Certain services provided by HOLIVIA or by Practitioners are based on the prior collection of your consent.

In the absence of consent, you will not be able to access these services whether they are provided by HOLIVIA or by the Practitioners.

Your explicit consent is also required for any use of data relating to your health by HOLIVIA or by practitioners.

Please note that you can withdraw your consent at any time by contacting: dpo@holivia.fr.

The withdrawal of your consent will not affect the lawfulness of the processing of your data carried out before its withdrawal.

How long is your data kept?

✓ As part of the Services provided by HOLIVIA

Your Data is retained as long as you are employed by a company that is a client of HOLIVIA.

When your name no longer appears on the list provided by your employer (which marks your departure), your account is deactivated and your Data is archived for a period of 3 years.

After this period, it is permanently anonymized, with only non-identifiable statistical data retained.

✓ As part of the Services provided by the Practitioner(s)

Your Data is retained by the Practitioner for the entire duration of your contractual relationship with the selected Practitioner.

After this period, your Data is archived for 3 years, and once archived, only non-identifiable statistical data is kept.

✓ Your payment data

It is retained only for the duration of the transaction (session purchase).

With your explicit consent (checkbox), your payment details may be stored to facilitate future payments.

What are your rights over your data?

In accordance with the Regulations, you are the holder of the following rights:

Right to information: you have the right to obtain clear, transparent, understandable and easily accessible information on how HOLIVIA and the selected Practitioner(s) use your personal data and on your rights. This is why HOLIVIA has drawn up this data protection policy.

Right of access: You have the right to access the personal data that HOLIVIA and the selected Practitioner(s) have on you (provided that the request is not manifestly unfounded or excessive, in particular due to its repetitive nature), and to obtain a copy.

Right of rectification : You have the right to demand that your personal data be rectified if they are inaccurate or out of date and/or that they be completed if they are incomplete (provided that your request is not manifestly unfounded or excessive, in particular due to its repetitive nature).

Right to object : You may at any time object to the processing of your personal data for reasons related to your particular situation when the processing of the data is based on the legitimate interest of HOLIVIA, unless HOLIVIA asserts legitimate and compelling grounds for the processing of such

data, which override your interests, rights and freedoms, or when such data is necessary for the establishment, exercise or defense of a legal right.

You also hold the following rights, which you can exercise under the same conditions:

Right to erasure (right to be forgotten) : In certain cases, you have the right to obtain the erasure or deletion of your personal data. This right is not absolute, to the extent that HOLIVIA and the selected Practitioner(s) may be forced to retain your data for legal or legitimate reasons.

Right to restriction of processing : You have the right to request that the processing of your personal data be limited, so that HOLIVIA and the selected Practitioner(s) can keep this data, but cannot use or process it.

Right to portability : You have the right to receive the personal data concerning you, which you have provided to HOLIVIA and the selected Practitioner(s), in a structured, commonly used and machine-readable format. This right only applies to data that you have provided directly or indirectly, when the processing is based on your consent.

Right to take advance directives : You also have the right to define your general guidelines relating to the conservation, erasure and communication of your personal data after your death which may be recorded with a trusted digital third party certified by the corresponding data protection authority operating in your country, and specific guidelines which may be recorded with the HOLIVIA Data Protection Officer (DPO) by email to the following email address: dpo@holivia.fr.

Right to register a complaint to the data protection authority of your country : You have the right to enter and submit a complaint to the data protection authority operating in your country to challenge the practices of HOLIVIA and the selected Practitioner(s) regarding the protection of personal data and respect for your privacy.

When the processing of your data requires your consent, you have **the right to withdraw this consent at any time**. You can therefore withdraw your consent at any time, without having to justify yourself, by email to the following email address: dpo@holivia.fr. Withdrawal of your consent does not compromise the lawfulness of processing based on your consent given before such withdrawal.

These rights can be exercised with the HOLIVIA Data Protection Officer (DPO) by email to the following email address: dpo@holivia.fr.

If you exercise your rights regarding the processing of reuse of your Data, HOLIVIA undertakes to transmit your requests in a timely manner to the promoter of the study concerned in order to facilitate the exercise of your rights over your Data.

Data security

HOLIVIA implements all security measures to guarantee the protection and security of data, in particular with regard to unauthorized access by a third party.

Your Data is hosted by a certified health data host within the meaning of article L 1111-8