

Privacy Policy

The Eforto™ application allows users to track key parameters of adults, such as frailty, risk of falling, malnutrition risk, grip strength and also level of satisfaction and conversion. The App is made available to users, ("**User**", or "**you**") by Uniweb on behalf of Danone Asia Pacific Holdings Pte. Ltd. ("**DAPH**").

For the provision of the Services, the App collects and processes the User's personal information as described hereunder. DAPH is responsible for the collection and use of this personal information (and can be considered the data controller).

In addition, to the extent you have agreed that personal information may be used for marketing purposes, another Danone entity is responsible for the use personal information for such purposes. The Danone entity responsible for the use of personal information for marketing purposes is: Danone Nutricia, S.R.L..

The responsible Danone entities are referred to as "**we**", "**our**" or "**us**" in this Privacy Policy. This Privacy Policy explains how we collect and process your personal information, the measures we have in place to keep it safe and the rights you have regarding the personal information we collect and process.

1.What personal information is collected

(a)Account Information

To conduct a test in the App, the User's full name is required. If the User also wishes to receive the results of a test, an e-mail address is required. To conduct a test in the App, the following information is needed ("Profile information"):

- First name, last name;
- Date of birth;
- Gender;
- Weight
- Height

Fill in Netto promoter score (NPS) and nutrition initiation information. This data is encrypted and stored in a cloud environment, described in further detail below. Additionally, you may share information on whether you started medical nutrition since the last time you conducted the test in the app.

(b)Sensitive Information

To optimally use all features of the App, the User must provide the following information, including but not limited to data of birth, weight, length and gender, answers to questionnaires on risk of falling and on risk of malnutrition.

(c)Device and Usage Information

When you access or use the App, DAPH will receive aggregated usage data. This includes information about:

- Number of users and tests
- Completed registrations
- Tests Started
- Completed tests
- Average completion time
- Drop off points
- Number of opened reports
- Geography
- Frailty risk level
- Identified fall risk level
- Identified malnutrition level
- Grip / muscle strength
- Muscle fatigability

In addition, logs are generated regarding your interaction with the App (for the purposes described hereunder), and we process your approximate location (i.e. not precise location but approximate location within a radius of more than 500m) for limited purposes listed below.

We store your personal information collected on the Amazon Web Services cloud located in Europe. We protect the security of your information with appropriate safeguards, during transmission and technical measures such as encryption protocols and software.

2.How we use your personal information

In this paragraph, we describe how we use personal information we collect when you use our Services, and the legal basis for such use. We may combine such personal information with personal information we have obtained about you when you used other products or services from us. We use personal information in the following ways. For the performance of our agreement with you:

- Account Information - In order to provide you with access to the reports and to link measurements to normative test data, we collect and use your Account Information.

For our legitimate commercial interests: It is necessary for our legitimate commercial interests in the effective delivery of Services and products to you and in the effective and lawful operation of our business (in each case provided such interests are not overridden by your rights) to use the personal information referred to above in the section 'What personal information is collected'. More specifically, this means the following.

- Account Information - we collect and use your Account Information in order to develop or improve our Services and also to analyze anonymized, aggregated data to understand usage trends and health data trends, associating with your personal information we collect via the App.
- Log Information – in order to develop and improve our Services, we collect and use your Log Information.
- Location Information – in order to develop and improve our Services, we collect and use your approximate Location Information.

We will also use the personal information referred to above in the section “What personal information is collected” in order to improve our Services as well as to understand our Users both on an aggregated and on an individual basis. This means that we analyse your use of the products and Services and we use this information to improve our products and Services and to give you a better user experience (e.g., we analyse the information you provide us, which enables us to create personal profiles and to assess what may be interesting to you and which recommendations we can give you). Where you have consented to receiving marketing materials and recommendations in our app or by e-mail (see consent section hereunder), the creation of profiles mentioned above also helps support those purposes.

Following your explicit consent. Based on your explicit consent, we collect and use the following personal information:

- We may use the personal information you provide to us referred to above in the section 'What personal information is collected' – including your health data you provide to us – for scientific and research purposes, notably for model improvements, product-related research and data analysis. This allows us for instance to improve our products and Services. For the purpose of science and research described above, the research activities may be conducted by DAPH itself or by other research centers, namely: Danone Global Research & Innovation Center BV (The Netherlands) and Danone Global Research & Innovation Center SAS (France).
- We may use the personal information you provide to us referred to above in the section 'What personal information is collected' – including health data you provide to us – for marketing purposes based on your profiles via email, messages in our application, via other electronic means or otherwise.

You can withdraw your consent at any time. Please refer to the process described in section 'User Rights' below on how to withdraw your consent, When you withdraw your consent, some functions of the App may be disabled.

3.Information for users

We only process information provided directly by the (adult) user of the App or through the use of the App, as specified above, and not based on external sources. The App is

not intended to be used by minors, and any information being provided regarding an individual under eighteen years of age must be provided by the adult caregiver as user of the App. We will ensure that any health data is only provided to us on a voluntary basis and with the explicit consent. The information is collected for enabling us to provide informed, appropriate and tailored Services to the relevant caregivers.

4.How the personal information is stored and shared

We engage third party vendors, agents, service providers, and affiliated entities to provide services to us on our behalf, such as support for the Services (e.g., technical support processing), research as well as related offline product support services, data storage, hosting and other services.

In providing their services, they can access, receive, maintain or otherwise process personal information on our behalf. Our contracts with these service providers do not permit use of your personal information for their own purposes. Consistent with applicable legal requirements, we take commercially reasonable steps to require third parties to adequately safeguard your personal information and only process it in accordance with our instructions.

In addition, we may be led to disclose your personal data to third parties where required by law (e.g. to government or law enforcement bodies in circumstances and under conditions described by law) or where disclosure is necessary to protect our rights.

We may from time to time share de-identified or aggregated information with our business partners.

In addition, in order to improve the quality of our Services we may share your personal information with third parties, subject to your explicit consent and security and confidentiality obligations consistent with this Privacy Policy and applicable law.

Please be informed that we may transfer and process any personal information you provide to us to countries other than your country of residence. The laws of these countries may not afford the same level of protection to your personal information. We will therefore seek to ensure that all adequate safeguards are in place and that all applicable laws and regulations are complied with in connection with such transfer. More in particular for data transferred from the EEA to countries outside the EEA that do not provide an adequate level of protection, we base the transfer on appropriate safeguards, such as the European Commission's Standard Contractual Clauses or other approved data transfer or certification mechanisms together with binding and enforceable commitments of the recipient. In each instance, we will assess the transfer and ensure that appropriate technical and organizational measures are put in place to ensure that an adequate level of protection is provided.

5.How long is the personal information stored

We only keep your personal information for as long as you use the Service, in relation to the purposes mentioned above (such as providing the Service to you, keeping the Service up and running, and data-based business decisions about new functions and possibilities. At your request or when you stop using the Service, we will either delete or

anonymize your personal information so that you can no longer be identified on that basis, unless we are legally permitted or legally obliged to store certain personal information.

6. User Rights

Depending on the law that applies (e.g. the General Data Protection Regulation), you may have certain rights regarding your personal information including the right to withdraw your consent for the use of your personal information. We have implemented various measures to facilitate the exercise of your rights. We list out below what these rights are and how you can exercise them:

Right	What is it?	How to exercise it?
Right to be Informed	The right to be informed about the personal information that we process about you.	You can find a list of all the information we process about you as listed in the table above. You can access this information anytime by reviewing this Privacy Policy.
Right of Access	The right to request access to the personal information that we process about you.	To exercise this right you can send us an email at dpo.research@danone.com explaining your request and we will get back to you as soon as we can.
Right to Rectification	The right to correct and/or update any incomplete/inaccurate data that we hold about you.	The App allows you to modify sensitive information entered by you. If there is something cannot be corrected directly in the App, you can email us at: dpo.research@danone.com
Right to Delete	The right to delete your personal information and close your account permanently.	If you wish to delete all your personal information entered into the App, you can do so by requesting account closure in the settings page.
Right to withdraw consent	The right to withdraw your consent.	If you wish to withdraw the consent you have provided us to process personal information for one or more purposes, you can do so by using the App's settings feature. If there is something cannot be corrected directly in the App, you can email us at: dpo.research@danone.com

Right	What is it?	How to exercise it?
Right to Restrict Processing	The right to request that we temporarily or permanently stop processing all or part of your personal information.	To exercise this right you can send us an email at dpo.research@danone.com explaining your request and we will get back to you as soon as we can.
Right to Data Portability	The right to receive your personal information in a commonly used machine-readable format.	You can request to download your information including all your personal information entered into the App. The data is in CSV format which is industry standard, and it can be imported into other systems.

7. Questions, Comments or Complaints

If the User has any questions, comments or complaints about the personal information and data entered into the app, the User can contact DAPH by sending an email to dpo.research@danone.com.

Alternatively, if you have any complaints about how we handle your privacy, you can also file a complaint with your local data protection authority (for Singapore, the [PDPC](#); for Japan, the [Personal Information Protection Commission/PPC](#); for the UK, the [Information Commission \[former Information Commissioner's Office\]](#); for EU countries, the default authority for Danone Global Research & Innovation Center BV is the Dutch [Autoriteit Persoonsgegevens](#), but also see other [EU data protection authorities](#)).

This Privacy Policy was last updated on **August 20, 2025**.