App Tracking and Analytics Policy for “HARTMANN Easy”

Effective Date:

We, N.V. PAUL HARTMANN S.A., place great importance on protecting your privacy and the integrity of your mobile device. To provide the features of our “HARTMANN Easy” mobile app, ensure system security, and continuously optimize our offerings, we use technologies that store information on your device or read it from it.

While traditional websites typically use so-called “cookies” for this purpose, native mobile applications use comparable technologies. This includes, in particular, third-party software development kits (SDKs), your device’s local storage, specific mobile advertising identifiers (such as the Identifier for Advertisers—IDFA on Apple devices or the Google Advertising ID—GAID on Android devices), and server-side application programming interfaces (APIs). When we refer to “tracking technologies” in this policy, we are summarizing all of these methodological approaches.

The use of these technologies is strictly governed by the Belgian Data Protection Act of July 30, 2018 and the General Data Protection Regulation (GDPR). Some technologies are strictly necessary for the app’s core functions and do not require consent. We use other technologies—particularly those used for detailed usage analytics—only if you have given us your explicit consent via our consent management banner when you launch the app.

1. What tracking technologies do we use?

We categorize the technologies we use based on their respective purposes:

1.1 Essential Technologies (Strictly Necessary) These technologies are essential for you to navigate the app and use its basic functions. This includes the secure and efficient storage of your login status (assignment of authentication tokens upon sign-in), the storage of your privacy preferences (your selections in the consent banner), and the server-side logging of security-related records. The latter includes, for example, the detection of erroneous or automated registration attempts (failed registrations) in our modules in order to preventively block fraudulent activities and cyberattacks . Without these technologies, the stability, security, and functionality of the app cannot be guaranteed. Legal basis: We do not require consent for this access, as it is strictly necessary (paragraph 2 of the article 10/2 of the Belgian Data Protection Act of July 30, 2018). The subsequent processing of personal data is based on the fulfillment of the user agreement or our legitimate interest in IT security.

1.2 Functional Technologies These technologies enable the app to permanently save the choices you make (e.g., language settings, preselected regions, or country settings when using modules). This allows us to offer you a personalized, seamless user experience without requiring you to re-enter the same information every time you launch the app.

1.3 Analytical and Marketing Technologies (Requires Consent) To continuously adapt our app to the needs of healthcare professionals and identify structural errors, we analyze user behavior in detail. To this end, we have integrated the **Google Firebase Analytics SDK** from Google Ireland Ltd. (or Google LLC, USA) into our application. Firebase Analytics operates in the background and links your smartphone's device ID to detailed interaction events. The metrics we evaluate include, among others:

- **Transactional events:** Frequency and type of app launches, login and logout activities, broken down by customer groups (e.g., new or existing staff).
- **Navigation data:** Views of specific screens within the app, such as profiles, news articles, professional resources, product catalogs, and detail pages.
- **Module interaction:** Use of the integrated EVA chatbot, as well as the initiation, progress, and completion of medical guidelines (e.g., starting the wound documentation guideline). Note: We collect only statistical metadata (indicating that a feature was used) and under no circumstances do we collect sensitive patient data or health data you have entered.
- **Default Metrics:** Standard system metrics regarding app performance, session duration, and error reporting (crash logs).

In addition—provided you have consented to the use of these analytics tools—we transmit aggregated registration data and usage metrics (such as registration for specific modules at the country level) to our in-house CRM system, (**Salesforce**). This enables us to precisely manage our resources and deliver specialized information tailored to your needs.

Legal basis: These analyses deeply access the storage of your end device and create detailed usage profiles. Therefore**,** Firebase Analytics and comparable tools are used **exclusively only if you have previously given your explicit, informed consent** (paragraph 1 of the article 10/2 of the Belgian Data Protection Act of July 30, 2018 in conjunction with Article 6(1)(a) GDPR).

2. Data Collection by App Store Operators (Apple and Google)

We would like to transparently point out that data is generated even before the app is installed. The operators of the distribution platforms (Apple App Store and Google Play Store) independently collect extensive metrics on reach and download behavior. This includes the frequency with which our app icon was displayed (impressions), visits to the product page by unique devices, and statistics on first-time downloads. This data collection is the sole responsibility of Apple and Google. We have no influence over this process and receive only anonymized, highly aggregated reports from the platforms.

3. Managing Your Privacy Settings

You always retain full control over your data. You can easily adjust your preferences regarding tracking technologies that require consent at any time. To do so, navigate to “Privacy Settings” or “Manage Tracking” in the profile settings or the app’s main menu. There, you can revoke your previously granted consent with immediate effect for the future or grant it again if needed. Withdrawal of consent will result in the corresponding SDK being blocked within the app, and it will no longer collect any further data.

For further legal information regarding the processing of your personal data and your rights as a data subject, please consult our main Privacy Policy for the app. If you have specific questions about app tracking, our Data Protection Officer is available at dataprotection.be@hartmann.info.