



COMPREHENSIVE PRIVACY NOTICE

PHYSICIANS AND HEALTHCARE PROFESSIONALS

1. IDENTITY AND ADDRESS OF THE CONTROLLER

This Privacy Notice governs the processing of personal data by **Kadu Care Group, S.A. de C.V.**, hereinafter referred to as “**KADU CARE**”, with registered address at Carretera a Nogales 3201, Col. Campolago, Zapopan, Jalisco, 45222, Mexico, acting as the **Data Controller**, and responsible for processing your personal data in order to protect your privacy and your right to informational self-determination, in accordance with the Federal Law on the Protection of Personal Data Held by Private Parties and other applicable regulations, under the supervision of the **Ministry of Anti-Corruption and Good Governance (SBAG)**, and the Privacy Notice Guidelines issued by the Ministry of Economy (the “Regulations”).

2. DEFINITIONS

For the purposes of this Notice, the definitions of the terms “Personal Data,” “Sensitive Personal Data,” “Days,” “Processing,” “Data Subject,” “Controller,” “Transfer,” “ARCO Rights” – “Right of Access,” “Right of Rectification,” “Right of Cancellation,” “Right to Object”; “Cookies,” as well as all other elements provided herein, shall have the meaning attributed to them in the applicable Regulations.

3. PERSONAL DATA WE COLLECT AND PROCESS

At KADU CARE, we collect and process the following personal data:

General Data

Full name, date of birth, nationality, work address(es); personal or institutional email address(es); work/office telephone number(s).

Professional Data

Information regarding your profession; specialty(ies); professional license number(s); additional professional activities related to medical practice; information related to the diseases or conditions you treat.

Sensitive Personal Data

KADU CARE collects and processes sensitive personal data provided by physicians and/or professionals and their patients, including biometric data such as voice data and personal data related to health conditions, which it receives in its capacity as data processor.

Personal Data from Public Sources and Authorized Transfers

Data obtained from public records, directories, social networks, and other lawful sources available on the market.

Data shared by our Clients who have obtained proper authorization to share such data with us.

Personal Data from Social Networks

KADU CARE may collect and process personal data and information you have shared on social networks (such as Facebook®, Twitter®, LinkedIn®, Instagram, TikTok, WhatsApp, among others), including information you have made public, in accordance with the terms and conditions and privacy policies of such platforms.

Third-Party Personal Data

Identification and contact data, including name, job title, work phone number and/or mobile phone number, and email address, used as references.

The personal data described above are collected through:

- i) the voluntary and direct provision of your information through our forms and/or application;
- ii) voluntary submission of information during patient consultations;
- iii) voluntary and direct submission through our website interfaces or via email; and
- iv) the use of publicly available sources and other market-available sources.

4. PURPOSES

At KADU CARE, we process your personal data to carry out activities and procedures aimed at fulfilling the obligations arising from any professional, commercial, and/or legal relationship established with you, which we consider **primary purposes**, including:

- Allowing access to our website and/or social media platforms: TikTok (Kadu Care), X (Twitter): Kadu Care, LinkedIn: Kadu Care, and Instagram: Kadu Care;
- Requesting, contracting, modifying, or canceling services;
- Registering you in our database;
- Managing access credentials and profile verification;
- Managing service payments;
- Managing digital tax receipts;
- Requesting quotations or service information;
- Creating and maintaining your file;
- Recording patient consultations for transcription and summary generation;
- Contacting Customer Service;
- Managing your transaction history and other operations;
- Managing, administering, and securing your personal data;
- Recording consultations for quality assurance, incident investigation, or administrative or legal procedures;
- Maintaining electronic and procedural safeguards in compliance with applicable law.

Additionally, we will process your personal data for **secondary purposes**, which are not necessary for the legal or contractual relationship, including:

- Sharing testimonials, comments, suggestions, complaints, and feedback;
- Evaluating service quality through surveys and other tools;
- Implementing activities to promote, maintain, and improve our services;
- Participation in chats, public walls on social media, and/or discussion forums;
- Reporting technical issues related to our websites;

- Sending promotional messages, offers, notices, marketing communications, or advertising content;
- Conducting demographic, interest, and behavior studies of healthcare professionals and their patients, including market research to offer personalized services and content;
- Creating anonymized databases through irreversible technical processes for research, statistical analysis, and the improvement or training of artificial intelligence models.

Legal Bases for Processing (Applicable to the European Union)

In accordance with the GDPR, KADU CARE informs data subjects in the European Union that processing is based on:

- **Performance of a contract:** for primary purposes related to service delivery.
- **Explicit consent:** for processing sensitive health data and for secondary marketing purposes.
- **Compliance with legal obligations:** for data retention required under fiscal, administrative, or healthcare regulations.

5. DATA SUBJECT CONSENT

For purposes of applicable legislation, you hereby acknowledge that:

- i) this Privacy Notice has been made available to you prior to the collection and/or processing of your personal data;
- ii) you have read, understood, and accepted the terms herein for the processing of your sensitive and financial data, and therefore, if provided, you will sign this document or provide your consent through the digital interfaces available on our website.

This is done in accordance with the Federal Law on the Protection of Personal Data and applicable regulations, under the supervision of the Ministry of Anti-Corruption and Good Governance (SBAG), without prejudice to legal exceptions allowing KADU CARE to process and transfer data to fulfill legal, contractual, or relational obligations.

For non-financial and non-patrimonial data, consent shall be deemed tacit if no objection is raised within 48 hours after the data has been collected and this notice has been made available through any means, including our website.

For patient health data processed through KADU CARE services, the Client (healthcare professional or institution) is responsible for obtaining and retaining informed consent from patients. KADU CARE may

provide consent templates, but the Client remains solely responsible for proving valid consent to patients and authorities.

6. DATA TRANSFERS TO THIRD PARTIES

KADU CARE may use your personal data to offer services directly or through commercial partners in Mexico and/or abroad, including the United States, Canada, and the European Union, or through subcontracted third parties.

Such transfers may include promotional communications related to our services. These purposes are not essential to the contractual relationship and may be objected to within five days from the date your data is processed.

Third parties receiving your data are contractually obligated to maintain confidentiality and comply with this Privacy Notice and applicable laws, including the Mexican Data Protection Law under SBAG supervision, HIPAA (U.S.), PIPEDA (Canada), and GDPR (EU).

For international transfers from the EU, UK, or Switzerland to non-adequate jurisdictions, KADU CARE implements Standard Contractual Clauses approved by the European Commission, including UK and Swiss addenda.

In the U.S., transfers are covered by Business Associate Agreements (BAA) under HIPAA.

In Canada, transfers comply with PIPEDA.

Due to cross-border processing, personal data may be subject to foreign laws allowing access by judicial or national security authorities under applicable local legislation.

7. PROCEDURE TO EXERCISE ARCO RIGHTS AND WITHDRAW CONSENT

You may exercise your rights of Access, Rectification, Cancellation, or Opposition (ARCO), or revoke consent for secondary purposes, by submitting a request using the form available on our website, including:

- Full name and address or email for response;
- Proof of identity (copy of official ID such as voter ID, passport, or visa);
- If applicable, proof of legal representation;
- Clear description of the personal data involved;
- Any additional information facilitating data location.

For access requests, data will be provided via the selected delivery method after identity verification.

For rectification requests, documentation supporting the requested changes must be provided.

KADU CARE will respond within **20 business days** of receiving the request. If applicable, execution will occur within **15 business days** following notification. Deadlines may be extended once for justified reasons under applicable law.

Requests are free of charge, except for justified reproduction or shipping costs. Repeated requests within 12 months may incur costs unless due to substantial changes in this Privacy Notice.

If the request is incomplete, additional information may be requested within five business days. The requester will have ten days to respond, or the request will be deemed not submitted.

Additional Rights

- **Mexico:** Data portability, processing limitation, and erasure where applicable.
- **European Union (GDPR):** Right to data portability, restriction of processing, and erasure (“right to be forgotten”).
- **Canada (PIPEDA):** Right to request correction of inaccurate or incomplete data.
- **United States (HIPAA):** Patients may exercise rights through their healthcare provider; KADU CARE will assist as a Business Associate.

If you believe your rights have been violated, you may file a complaint with the relevant data protection authority.

8. PRIVACY OFFICER

In compliance with international standards and PIPEDA, KADU CARE appoints:

RAJAN SAPKOTA

Email: rajan@kaducare.com | info@kaducare.com

Phone: +1 (236) 978-1339

9. LIMITATION ON USE AND DISCLOSURE OF INFORMATION

KADU CARE will retain personal data for the duration of the contractual, professional, or legal relationship and thereafter only as required by law:

- **Mexico:** Five years under health, tax, and administrative laws (SBAG).
- **United States:** Up to six years under HIPAA.
- **Canada:** As required under PIPEDA and applicable provincial laws.
- **European Union:** Duration of the contractual relationship and up to five years thereafter, unless otherwise required by law.

After these periods, data will be securely deleted or anonymized.

Appropriate administrative, technical, and physical security measures are implemented to protect personal data against loss, misuse, unauthorized access, alteration, or destruction.

To limit the use or disclosure of your data, please email: info@kaducare.com

Protection of Minors and Legally Incapacitated Persons

KADU CARE does not knowingly collect personal data from minors or legally incapacitated persons unless provided by a parent or legal guardian. If such data is identified, it will be promptly deleted. If you become aware of such data submission, please contact: info@kaducare.com.

Data Collection Through Website Use

KADU CARE may collect personal data through its website using automatic data collection tools, including cookies.

Use of Cookies

Cookies are small data files stored on your device to enable website functionality. You may disable cookies via your browser settings; however, this may limit site functionality.

Instructions:

- **Microsoft Edge**

<https://support.microsoft.com/es-es/windows/administrar-cookies-en-microsoft-edge-ver-permitir-bloquear-eliminar-y-usar-168dab11-0753-043d-7c16-ede5947fc64d>

- **Google Chrome:**

<https://support.google.com/chrome/answer/95647?hl=es&hlrm=en>

Consent for Non-Essential Cookies

In compliance with the ePrivacy Directive, GDPR, PIPEDA, and Quebec's Law 25, KADU CARE will obtain explicit consent before placing non-essential cookies. Consent may be withdrawn at any time via website settings.

For more information, see our Cookie Policy at www.kaducare.com.

10. CHANGES TO THIS NOTICE

KADU CARE reserves the right to update this Privacy Notice to reflect operational, legal, or regulatory changes. Updates will be published on our website along with the date of the last modification.

11. CONSENT ACKNOWLEDGMENT

By signing below or by accepting electronically, you expressly consent to the collection, processing, transfer, and use of your personal data, including health and financial data, as described in this Privacy Notice.

Printed Format

Name:

Signature:

Date:

Online Mechanism

I expressly accept the terms and conditions of this Privacy Notice

Accept

(Type here)

[Electronic Signature]

In the event of future legal or regulatory changes affecting the competent data protection authority in Mexico, references herein shall apply to the authority in force at that time.