

## DATA PROCESSING POLICY

### ROAM Project: Reuse of MS-FLOWER and MuControl data for the optimization of walking algorithms.

Version 1.0 of 21/04/2026

This study is being conducted by Ad Scientiam, the company responsible for the processing, located at 38 rue Dunois, 75647 Paris Cedex 13

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Ad Scientiam is a company specializing in the study and development of digital biomarkers integrated into mobile applications and medical devices. Digital biomarkers are physiological or behavioral measurements that allow for monitoring the progression of diseases and the effectiveness of treatments.

As part of the continuous improvement of its applications, Ad Scientiam conducts studies in the health field using data that it has been able to collect through the regular use of its solutions, or from clinical studies.

#### 1) Why this study?

In a Research and Development approach, Ad Scientiam wishes to proceed with the reuse of deidentified data from the MS-FLOWER (NCT: 06922942) and MuControl (NCT: 06147778) clinical studies.

The objective is to explore the walking behavior of users in ecological conditions within the framework of Mobile Walk Endurance Test (MWET) and Mobile Walk Perimeter Test (MWPT) carried out during the aforementioned studies. Indeed, the collection environment can influence the quality of the GPS signal, while the shape and configuration of walking routes can have an impact on the results provided by the algorithm.

This exploration aims to better characterize the limits and constraints related to the use of mobile applications developed by Ad Scientiam containing these walk tests, in order to improve the walk analysis algorithms.

This processing serves the legitimate interests pursued by Ad Scientiam, including the continuous improvement of the mobile applications, tests, and algorithms it develops.

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## **2) How will your personal data be processed?**

This study is based solely on the reuse of patient data collected during the MuControl clinical trials (NCT06147778) and MS-Flower (NCT06922942).

The reused data is fully deidentified in accordance with HIPAA regulation, meaning your identity has been replaced by an identification number. Therefore, those at Ad Scientiam who analyze your data will not have access to your first and last name.

## **3) What personal data concerning me is being processed?**

The following information will be reused in this study:

- Identifier: The coded identifiers that were assigned to you during the initial studies are transformed in order to permanently delete the link with the identifiers of the initial studies;
- Your personal information: age, gender;
- Your health data, and in particular your medical condition, your EDSS score, your weight and height, your ability to perform numerical tests, etc.;
- Data from the MS-Copilot or MuCopilot mobile applications, and in particular:
  - your results on the application tests;
  - raw data (for example, data from (the accelerometer or gyroscope of your smartphone, when you perform the tests);
  - metadata when using the application, and for example: information about your phone, such as model, platform, operating system version, build number, application version and screen-related characteristics (height, width, resolution).

## **4) Who will have access to your personal data?**

The following people will have access to your deidentified data:

- Ad Scientiam's specially authorized staff within the limits of their respective responsibilities and exclusively for the purpose of carrying out this study;
- Legally authorized health or control authority personnel;
- In case of dispute, the authorized staff of our insurance organization;
- The service providers with whom we contract, specially authorized, and in particular our health data hosting provider;
- Any independent experts tasked with re-analyzing the data to verify the research results;
- If you contact him to exercise your rights, or to make a complaint, the data protection officer of Ad Scientiam.

## **5) Is my data being transferred outside the European Union?**

Your personal data will be stored on secure servers offering sufficient levels of assurance for the processing of your personal data and located within the European Union.

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No transfer of your data outside the European Union is carried out as part of this study.

#### 6) How long will your personal data be kept?

Your data will be made available to the Ad Scientiam teams responsible for implementing the study for a period of 2 years, and at the latest until the end of 2028.

They will then be archived in accordance with applicable regulations for a period of 10 years, and at the latest until 2038.

#### 7) What are your rights regarding your personal data?

You have certain rights under certain conditions, and in particular:

- the right to access information concerning you, in particular to verify its accuracy;
- the right to rectify, complete or update them;
- your right to object to the processing of your data:
  - up to one month after the publication of this privacy policy: your data will not be reused in the context of this study;
  - After this period, no new data concerning you will be collected; however, your right to object will have no effect on the analyses already carried out by the Ad Scientiam teams;
- the right to request the erasure of your data which has already been collected: however, your request may not be granted if this would make it impossible or seriously compromise the achievement of the research objectives;
- the right to limit the processing of your data, that is to say, to temporarily block the use of your data;

If you feel, after contacting us at [privacy@adscientiam.com](mailto:privacy@adscientiam.com) If your rights have not been respected, you also have the right to lodge a complaint with the [National Commission for Information Technology and Freedoms](#):

- by post: National Commission for Information Technology and Freedoms, Complaints Department, 3 Place de Fontenoy, TSA80715, 75334 PARIS CEDEX 07;
- or online: <https://www.cnil.fr/fr/plaintes>.

#### 8) How to contact us

For more information and to exercise your rights, you can contact Ad Scientiam by email at the following address: [privacy@adscientiam.com](mailto:privacy@adscientiam.com).

In this case, you must indicate your identity, the right you wish to exercise from those indicated above, as well as the personal data you wish to access, or that we need to correct, update or delete.

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When necessary or in case of reasonable doubt about your identity, we may ask you to identify yourself precisely with a copy of an identity document (identity card or passport) or any other element that allows us to justify your identity.