

# PRIVACY POLICY

**Effective Date: 30 January, 2026**

## Introduction

Lucis SAS ("**Lucis**", "**we**", "**our**" or "**us**") is committed to protecting your privacy. This Privacy Policy explains how, as a data controller, we collect, use, disclose, and safeguard your personal data when you visit our Lucis website [www.lucis.life](http://www.lucis.life), when you create an online account on our Platform, when you use our services (collectively, the "**Services**").

The purpose of this document is to inform you about the categories of personal data we collect about you, how we process your personal data, why we use your personal data, who receives this data, how long we keep it, and what rights you have regarding your personal data.

## Who Are We?

Lucis is an AI-powered preventive health platform ("**Lucis Platform**") with a mission to make longevity accessible and affordable. We are established in France and acts as data controller in the meaning of the GDPR:

Lucis SAS  
7 rue Mariotte  
75017 Paris  
France

Company Registration Number: 92785395200012  
VAT Number: FR10927853952  
Trade Register: Paris

Email: [legal@lucis.life](mailto:legal@lucis.life)

## Data we Collect

As part of our activities, we collect and use your personal data to offer services suited to your needs. This includes the creation and management of a User account on Lucis Platform, User relationship management,

direct marketing operations, the purchase of Products on our website (Shopping part of our Website), and as detailed in Section 4.

**a) Identification and contact details**

- **Account Information:** When you create an account, we collect your first name, last name, phone number, gender, email address, password, date of birth, referral code and contact information. We also collect a postal code, if you provide us with.
- **Profile Information:** Information you provide in your User profile: your photo, height, weight, menstrual cycle, lifestyle habits (e.g., meal times, sleep times, ...), health goals, health and family history.
- **Communications:** Information you provide when you contact our customer support, your phone number, messages sent, emails, and other communications with us.

**b) Data concerning health**

- **Information about your health:** information about your health status, including biomarker data, health history, health family background, symptoms, health conditions, and other health-related information you choose to share with us, evolution of your health status.
- **Test Results:** Laboratory test results that you upload on the Lucis Platform.
- **Information and reports generated on the Lucis Platform by our AI-powered tool and reviewed by a doctor:** estimated biological age, results and ranking of biomarker data with a colour code to identify the risks linked to biomarker data, recommendations on nutrition and foods to eat, as well as recommendations on lifestyle and sleeping habits, sports activities to prioritize, generated on the basis of the analysis of the results and the lifestyle described by the User.
- **Financial and transactional data:** We collect your Stripe ID (online payment platform).

**c) Data relating to challenges**

- Name, Submission date and time, proof (provided or not), username, picture uploaded or screenshot, specific data for each challenge.

**d) Data relating to direct marketing activities**

- **Data relating to direct marketing activities:** We collect identification and contact details, details relating to the monitoring of the commercial relationship (e.g., requests for documentation or information, origin of the request, exchanges and comments), your choice regarding receiving commercial information about Lucis Products, promotions, newsletters.

**e) Data relating to the use of the Services**

- **Device Information:** Information about the device you use to access our Services, including device type, unique device identifiers, and mobile network information.

- f) Cookies and Similar Technologies:** We use cookies and similar tracking technologies to collect information about your browsing activities, subject, as applicable, to your consent. This information includes, among other things, how you access and use our Services, including your IP address, browser type, operating system, referring/exit pages, clickstream data, and the dates and times of your visits. Please see our [Cookie Policy for more information](#).
- g) Data relating to contacts and exchanges**
- **Data relating to contacts and exchanges on WhatsApp “le Club”:** date and time of messages, content of messages, date and time of call.
  - **Use of our Chat available online:** date and time of messages sent, content of messages, voice messages if you use this feature, file sent with your message.
- h) Data relating to your purchases**
- **Data relating to your purchases:** currency selected, Products you placed in your online shopping cart, Product(s) you bought, date and time of purchase, quantity of Products you bought, pre-order offer selected, amount saved on purchase, discount code.
  - **Data relating to delivery:** contact information, country, first name, last name, company (if any), address, postal code, city, phone number, shipping method (free express shipping, express shipping, point relais selected, ...), payment information (Credit card, PayPal, ShopPay).
  - **Data relating to your opinion and review:** email address, grade given for the review (1 to 5 stars), display name, content of the review message, photo (if any), date and time of the review.

## How we Use Your Data

Lucis uses your personal data for several purposes detailed below. For each of these purposes, we specify the legal basis on which we process these data as well as the relevant retention period or, when this is not possible, the criteria used to determine this period.

The purpose of processing your data	The legal basis for the processing of your personal data	The retention period of your personal data
<b>Creation and management of a User account on the Lucis Platform:</b> we process your personal data to enable the creation and management of your user account.	The processing is necessary for the <b>performance of the Terms and Conditions</b> .	Your data is kept for the duration of your account activity, plus the duration of the applicable legal requirements, i.e. 5 years.
<b>Analysis and creation of reports on the Lucis Platform:</b> we process your personal data to generate and provide you with the reports based on your biological analysis on the Lucis Platform, based on our AI-powered tool.	The processing is necessary for the <b>performance of the Terms and Conditions</b> .  Or  Your <b>express consent for the processing of your health data</b> .	Your data is kept for the duration of your use of the Lucis Platform, plus the duration of the applicable legal requirements, i.e. 5 years, or, as applicable until you withdraw consent

<p><b>Generation of personalised recommendations:</b> we process your data to personalize your experience, including analyzing your health data to provide personalized insights, recommendations, and health optimization protocols.</p>	<p>The processing is necessary for the <b>performance of the Terms and Conditions</b>.</p> <p>Or</p> <p>Your <b>express consent for the processing of your health data</b>.</p>	<p>Your data is kept for the duration of your use of the Lucis Platform, plus the duration of the applicable legal requirements, i.e. 5 years or, as applicable until you withdraw consent</p>
<p><b>Recommendation on well-being:</b> we process your personal data to generate recommendations on nutrition and foods to eat, as well as recommendations on lifestyle and sleeping habits, sports activities to prioritize, generated on the basis of the analysis of the results and the lifestyle described by you.</p>	<p>The processing is necessary for the <b>performance of the Terms and Conditions</b>.</p> <p>Or</p> <p>Your express <b>consent for the processing of your health data</b>.</p>	<p>Your data is kept for the duration of your use of the Lucis Platform, plus the duration of the applicable legal requirements, i.e. 5 years.</p>
<p><b>Connecting with Healthcare Professionals and Laboratories:</b> Connection upon request with external healthcare professionals (including a telemedicine platform) and biology laboratories.</p>	<p>The processing is necessary for the performance of the <b>Terms and Conditions</b>.</p> <p>Or</p>	<p>Your data is kept for the duration of your use of the Lucis Platform, plus the duration of the applicable legal requirements, i.e. 5 years.</p>

	Your express <b>consent for the processing of your health data.</b>	
<b>User relationship management:</b> we process your personal data to manage and process your requests and offer you Lucis Services.	<b>Our legitimate interest</b> in managing our relationship with you. Or Your <b>express consent for the processing of your health data.</b>	Your data is kept for the duration of your request, plus the duration of the applicable legal requirements, i.e. 5 years.
<b>Management of the Le Shop service:</b> we process your personal data to manage the shopping website and its features.	<b>Our legitimate interest</b> in managing our online Services.	Your data is kept for the duration of the management of our activities, plus the duration of the applicable legal requirements, i.e. 5 years.
<b>Management of deliveries and requests on your orders:</b> we process your personal data if you order Lucis Products on Le Shop or have any kind of requests regarding the Products you ordered.	The processing is necessary for the <b>performance of the Terms and Conditions.</b>	Your data is kept for the contractual relationship you have with us and kept up to 5 years after the end of the contractual relationship.

<b>Management of billing activities:</b> we process your personal data for the management of the billing history and activities of our company.	The processing is necessary for compliance with our <b>legal obligations</b> (including accounting and tax requirements)	Your data is kept for the duration of the contractual relationship, plus the duration of the applicable legal requirements, i.e. 10 years after the end of the contract.
<b>Satisfaction surveys:</b> we process your personal data when we send you satisfaction surveys and other questionnaires about our Products available on our Shop.	<b>Our legitimate interest</b> in knowing and understanding your satisfaction regarding the Products and services you ordered (when non health data is used).	Your data is kept for the duration necessary to achieve the purpose of the survey.
<b>Direct marketing operations:</b> when you subscribe to our newsletter or when you create an account or purchase Products, you will be offered the opportunity to receive promotional offers and information relating to Lucis's Products, Services, promotions, news and tips by email.	Your <b>consent for receiving e-marketing communications</b> .  Or  <b>Our legitimate interest</b> in sending you marketing communications about similar products and services you already ordered.	Until you withdraw your consent, , object to receiving marketing communications, or for 3 years from the last contact with you.
<b>Claims and litigation management:</b> we process your personal data as part of the processing of any complaints you may have related to Lucis's Services.	<b>Our legitimate interest</b> in having the necessary information in the event of a claim or litigation, and in managing our defense.  The processing is necessary for compliance with our <b>legal obligations when responding</b> to a request	Your data is kept for the duration of the management of the request, plus the duration of the applicable legal requirements, i.e. 5 years.  Until the prescription of all legal remedies.

	from authorities, courts, or any other competent authority.	
<b>Management of your rights requests in accordance with the GDPR and personal data protection regulations</b>	The processing is necessary for compliance with our <b>legal obligations</b> under personal data protection regulations.	Your data is kept for the duration of the management of the request, plus the duration of the applicable legal requirements, i.e. 5 years.
<p><b>Management of cookies and other trackers:</b> to ensure the proper functioning of our site, we use cookies that are necessary for its operation (also referred to as ‘trackers exempt from consent collection’).</p> <p>Additionally, with your consent and depending on your preferences, we and our partners use cookies to provide you with the following, as outlined in the cookie banner on our site:</p> <ul style="list-style-type: none"> <li>● Personalized advertising</li> <li>● Content personalization</li> <li>● Audience and performance measurement</li> </ul>	<p>Your <b>consent</b>.</p> <p>Or</p> <p><b>Our legitimate interest</b> of providing you with a performing website</p>	<p>The data relating to your choice (acceptance or refusal) of the deposit of cookies and other tracers are kept for 6 months.</p> <p>Trackers exempt from consent collection because they ensure the proper functioning of the site (including certain audience measurement trackers) have a lifespan of 13 months.</p> <p>Information collected via trackers exempt from the requirement to obtain consent is stored for a maximum of 25 months.</p>



<p>You can modify your choices, withdraw your consent, or update your preferences at any time by clicking ‘Set my cookies’ at the bottom of the site page."</p> <p>For more information, please refer to our Cookie Policy.</p>		
<p><b>Management of the support and security of the Lucis’s Services</b></p>	<p><b>Our legitimate interest</b> to manage and ensure the support and security of Lucis Services.</p>	<p>The data will be stored for the duration of the applicable legal requirements, i.e. 5 years.</p>
<p><b>Research and Studies; Service Development and Improvement; Statistics Production; Data Anonymization</b></p> <ul style="list-style-type: none"> <li>• <b>Internal Improvement: Analysis of available data to enhance the quality and relevance of recommendations, algorithms, and user experience.</b></li> <li>• <b>Production of Aggregated and Anonymized Statistics: For informational purposes.</b></li> </ul> <p><b>Scientific Studies: Descriptive analyses and impact studies, where applicable, as sole sponsor or in academic/private partnership.</b></p>	<p><b>Our legitimate interest in improving services and producing service-related statistics (when no health data is used).</b></p> <p><b>Or</b></p> <p><b>Your explicit consent for processing health data, unless the processing is based on public interest (research and studies).</b></p>	<p><b>3 years</b> from the date of last contact in case of account inactivity, or until account termination (including user’s deletion request), or <b>13 months</b> after collecting connection and platform usage data, or <b>1 year</b> from the day the IP address is recorded, or <b>3 months</b> after receiving responses to satisfaction surveys or other questionnaires, or <b>3 years</b> from the collection of the user’s health data.</p> <p>Data may be retained for a longer period when required by applicable laws or regulations governing research and studies.</p>

<b>Management of Merger, Acquisition, or Other Financial Transactions: Management of merger, acquisition, or any other financial operation involving all or part of our assets or activities.</b>	<b>Our legitimate interest in ensuring the development of our business.</b>	<b>Your data is kept for the duration of the contractual relationship, plus the duration of the applicable legal requirements, i.e. 5 years.</b>
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# International Data Transfers

Your personal data is not transferred to, and processed in, countries other than the European Union countries and the United Kingdom.

## Your Data Protection Rights

Under the GDPR and other applicable data protection laws, you have certain rights regarding your personal data:

- **Right to Access:** You have the right to request confirmation as to whether we process your personal data and, if so, to provide you with a copy and inform you of the characteristics of its processing.
- **Right to Rectification:** You have the right to request that we correct any information you believe is inaccurate or complete information you believe is incomplete.
- **Right to Erasure:** You have the right to request that we erase your personal data, in the following cases: If the data is no longer necessary for the purposes for which it was collected; If you have withdrawn your consent; If you have objected to the processing of your personal data; If your personal data has been unlawfully processed; Or to comply with a legal obligation.

Please note that we are not obliged to comply with your request in certain circumstances, particularly if the processing of your personal data is necessary to comply with a legal obligation or for the establishment, exercise, or defense of legal claims.

- **Right to Restrict Processing:** You have the right to request that we restrict the processing of your personal data (meaning we may store your data but not use it) in the following situations: You contest the accuracy of your personal data, for the time needed to verify its accuracy; The processing is unlawful, but you do not want the data to be erased; The data is required by you for the establishment, exercise, or defense of legal claims; You have exercised your right to object and verification of whether overriding legitimate grounds exist is pending.

We may continue to use your personal data after a restriction request in the following cases: We have your consent; For the establishment, exercise, or defense of legal claims; Or for the protection of the rights of another natural or legal person.

- **Right to Data Portability:** You have the right to request that we transfer the data we have collected to another organization, or directly to you, when the processing is based on your consent or on the performance of a contract and is carried out using automated means.

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| <ul style="list-style-type: none"><li>- <b>Right to Object:</b> You have the right to object to our processing of your personal data based on our legitimate interest.</li></ul> |
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| <ul style="list-style-type: none"><li>- <b>Right to Object to direct marketing:</b> you may, at any time, object to your personal data being processed for the purposes of prospecting, including the profiling of your data when this profiling is linked to the prospecting.</li></ul> |
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- **Right to Withdraw Consent:** You have the right to withdraw your consent at any time where we are relying on consent to process your personal data.
  - **Right to set directives concerning the storage, erasure, and communication of your personal data after your death.**
  - **Right to lodge a complaint:** you have the right to lodge a complaint with a competent personal data protection authority. In France, you have the right to file a complaint with the CNIL, whose website is accessible at the following address: [www.cnil.fr](http://www.cnil.fr) located at 3 Place Fontenoy, 75007 Paris.

If you have any request or wish to exercise any of these rights, please contact us at [legal@lucis.life](mailto:legal@lucis.life) or Lucis SAS, 7 Rue Mariotte 75017 Paris, France.

## Data Retention

We retain your personal data for a period of time that is adequate and necessary for the fulfilment of the purposes for which it was collected. our Personal Data is retained by Lucis for the period strictly necessary to fulfill the purposes for which it was collected. Lucis also complies with any applicable retention period under applicable laws and regulations. For more details on retention periods, please refer to the table available above in the Section named “How we Use your Data”.

## Data Security

Lucis implements technical and organizational security measures to ensure the security of Personal Data and to protect it against unauthorized access, loss, or disclosure.

Personal Data processed on the Lucis Platform is hosted by AWS France, certified as a health data host (“HDS”). The servers are located in French territory. In this respect, you are informed that you have the right to object to the hosting of your data by Lucis for a legitimate reason by sending an email to the following address: [legal@lucis.life](mailto:legal@lucis.life).

Below are the main security measures for the Lucis platform:

### Data Security

- Use of AWS VPC to create an isolated network, with private subnets for databases and public subnets for load balancers.
- Encryption of sensitive data using AES-256 for storage (S3) and TLS 1.2 or higher for transit.

## **Identity and Access Management**

- IAM policies implementing the principle of least privilege, audited quarterly.
- Multi-factor authentication (“MFA”) required for all access, using authentication applications or physical tokens.
- Semi-annual review of access policies to ensure their adequacy with operational needs.

## **Backup and Disaster Recovery**

- Automated daily backups with Amazon RDS, and EBS snapshots taken every 6 hours, retained for 90 days.
- Disaster recovery plan tested bi-annually, with Recovery Point Objectives (RPO) of 4 hours and Recovery Time Objectives (RTO) of 24 hours.

## **Security Training and Awareness**

- Mandatory annual security training for all employees, supplemented by quarterly sessions on current threat trends.

# **Recipients of Personal Data**

Your Personal Data may be shared with the following recipients as part of the purposes described in this Policy:

- Lucis's subcontractors involved in the processing of Personal Data.
- Lucis personnel on a need-to-know basis.
- External healthcare professionals and biology laboratories.
- Public or judicial authorities
- Potential acquirers

# **Your Data Protection Rights**

In accordance with applicable legislation, Users have the right to access, rectify, and delete their Personal Data. Users also have the right to object to their processing, request the limitation of their processing, and request their portability. You have the right to lodge a complaint with the supervisory authority, in France: the Commission Nationale Informatique et Libertés (CNIL): CNIL - Service des Plaintes - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.

Users can exercise their rights by contacting Lucis's Data Protection Officer, by mail at the address Lucis SAS, 7 rue Mariotte, 75017 Paris, France or by email at the address [legal@lucis.life](mailto:legal@lucis.life).

## Cookies and Tracking Technologies

We use cookies and similar tracking technologies to track activity on our Services and hold certain information. Cookies are files with a small amount of data that may include an unique identifier.

You can set your preferences regarding cookies and similar tracking technologies on your browser to refuse all cookies or to indicate when a cookie is being sent. You can also set your preferences directly on our Cookies Management Platform.

For more information about the cookies we use, please see our Cookie Policy.

## Changes to This Privacy Policy

We may update our Privacy Policy to reflect changes in legislation and regulations, or our data processing practices. We will notify you of any changes by posting the new Privacy Policy on this page and updating the "Effective Date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

We invite you to consult it regularly in the Privacy Policy section of our website : <https://lucis.life/privacy>

## Contact Us

If you have any questions about this Privacy Policy or our data practices, please contact our data protection officer (“DPO”) or us at [legal@lucis.life](mailto:legal@lucis.life) or Lucis SAS, 7 rue Mariotte, 75017 Paris.