PRIVACY POLICY

Last updated November 06, 2026

This Privacy Notice for **Sensia** ("**we**," "**us**," or "**our**") describes how and why we might access, collect, store, use, and/or share ("**process**") your personal information when you visit our website at https://www.sensia.bio (the "Website").

Please note that **this Privacy Notice applies to the Sensia corporate website**, including its informational content and email contact links. It **does not apply to the Sensia API or to our other websites, such as docs.sensia.bio, playground.sensia.bio, sport.sensia.bio, and clinical.sensia.bio**.

ABOUT US

Sensia develops software solutions for the analysis and interpretation of physiological and behavioral data collected through wearable devices.

Sensia provides an API-based platform that enables businesses, developers, researchers, and other organizations to integrate wearable data processing and analysis capabilities into their own applications, products, and services.

Through its proprietary algorithms and data processing infrastructure, Sensia transforms physiological signals and wearable-derived data into structured insights and digital biomarkers related to cognitive performance, emotional states, and psychological stress, including indicators such as attention, focus, memory, reasoning, valence and arousal.

These services are designed to support a range of applications, including but not limited to digital health, corporate wellbeing, sport performance and workplace safety.

Sensia provides these services primarily through cloud-based infrastructure and API endpoints, allowing authorized users and third-party systems to submit data, retrieve analytical outputs, and integrate Sensia's capabilities into their own technological environments.

Questions or concerns? Reading this Privacy Notice will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Website. If you still have any questions or concerns, please contact us at info@sensia.bio

SUMMARY OF KEY POINTS

This summary provides key points from our Privacy Notice, but you can find out more details about any of these topics by referencing the relevant section in the full notice below.

What personal information do we process? When you visit our Website or write to us by email, we may process the personal information described in section 1.

Do we process any sensitive personal information? Some information may be considered "special" or "sensitive" in certain jurisdictions, for example health data, racial or ethnic origins, sexual orientation, and religious beliefs. We do not ask for sensitive personal information on the Website.

Do we collect any information from third parties? We do not collect any information from third parties.

How do we process your information? We process your information to provide and secure our Website, respond to your messages, and comply with law. We process your information only when we have a valid legal reason to do so.

In what situations and with which parties do we share personal information? We share information with the service providers that host our Website and our email, and in the other specific situations described in section 4.

How do we keep your information safe? We have adequate organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information.

How do you exercise your rights? The easiest way to exercise your rights is by contacting us at info@sensia.bio. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the Privacy Notice in full below.

TABLE OF CONTENTS

1. WHAT INFORMATION DO WE COLLECT?
2. HOW DO WE PROCESS YOUR INFORMATION?
3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?
4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?
5. HOW LONG DO WE KEEP YOUR INFORMATION?
6. HOW DO WE KEEP YOUR INFORMATION SAFE?
7. DO WE COLLECT INFORMATION FROM MINORS?
8. WHAT ARE YOUR PRIVACY RIGHTS?
9. CONTROLS FOR DO-NOT-TRACK FEATURES
10. DO OTHER REGIONS HAVE SPECIFIC PRIVACY RIGHTS?
11. DO WE MAKE UPDATES TO THIS NOTICE?
12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?
13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

1. WHAT INFORMATION DO WE COLLECT?

Personal information you disclose to us

In Short: *We collect personal information that you provide to us.*

We collect personal information that you voluntarily provide to us when you write to us by email, for example through the email links on our Website.

Personal Information Provided by You. The personal information that we collect depends on what you choose to include in your message. It may include the following:

- names
- email addresses
- organization names
- the use case or plan you are interested in
- the content of your message and any other information you choose to include

Sensitive Information. We do not ask for sensitive information. Please do not include health data or other sensitive information in your messages.

Writing to us is voluntary. If you do, we need your email address and enough detail to understand your request; without them, we cannot reply.

Information collected automatically

When you visit our Website, our hosting provider, GitHub, automatically receives technical data such as your IP address and browser details, as described in section 4. The Website does not set cookies or use similar tracking technologies. You can read more in our Cookie Policy at https://www.sensia.bio/cookies.

2. HOW DO WE PROCESS YOUR INFORMATION?

In Short: *We process your information to provide and secure our Website, respond to your messages, and comply with law. If we want to use your personal information for a new purpose, we will tell you first.*

We process your personal information for the following reasons:

- **To provide and secure our Website.** Technical data is processed so that the Website can be delivered to your browser and protected against misuse.
- **To respond to your messages.** We process your information to answer your inquiries, including questions about our products, pricing, and plans.
- **To send you information you ask for.** If you ask us for details about our products and services, we use your email address to send them to you. We do not send marketing emails.
- **To comply with law and protect our rights.** We may process your information when the law requires it, or when necessary to establish, exercise, or defend our legal rights.

3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?

In Short: *We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e., legal basis) to do so under applicable law, such as to respond to your requests before entering into a contract, to fulfill a contract, to comply with laws, or to pursue our legitimate interests.*

If you are located in the EU or UK, this section applies to you.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- **Legitimate Interests.** We process technical data to deliver and secure the Website, process messages to answer general questions and keep a record of our correspondence, and process information where necessary to establish, exercise, or defend our legal rights, because we have a legitimate interest in doing so. You can object to this processing, as described in section 8.

- **Performance of a Contract.** We process your personal information when this is necessary to respond to your request about our products, pricing, or plans before entering into a contract with you, or to fulfill a contract we have with you.
- **Legal Obligations.** We may process your information where it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency.

If you are located in Canada, this section applies to you.

We may process your information if you have given us specific permission (i.e., express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e., implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way
- For investigations and fraud detection and prevention
- For business transactions provided certain conditions are met
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim
- For identifying injured, ill, or deceased persons and communicating with next of kin
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced
- If the collection is solely for journalistic, artistic, or literary purposes
- If the information is publicly available and is specified by the regulations
- We may disclose de-identified information for approved research or statistics projects, subject to ethics oversight and confidentiality commitments

4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

In Short: *We share personal information with the service providers that host our Website and our email, and in the other specific situations described in this section.*

We use the following service providers:

- **Website hosting (GitHub).** Our Website is hosted on GitHub Pages, a service of GitHub. GitHub receives technical data when you visit the Website and states that it logs and stores visitors' IP addresses for security purposes. GitHub describes its own practices in its privacy statement at https://docs.github.com/en/site-policy/privacy-policies/github-general-privacy-statement.
- **Email hosting (Register S.p.A.).** Our email is hosted by Register.it, a service of Register S.p.A. If you write to us by email, your message and the details it contains are received and stored through this service.

We do not use advertising or analytics providers. We may also need to share your personal information in the following situations:

- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Legal Requirements.** We may disclose your information where the law requires it, for example to comply with a court order or a request from a public authority, or where necessary to establish, exercise, or defend our legal rights.

International transfers

GitHub may store and process personal information in the United States and in other countries outside your own. GitHub states that it has certified to the EU-U.S. Data Privacy Framework, the UK Extension to it, and the Swiss-U.S. Data Privacy Framework, and that for transfers from the EU, UK, and Switzerland to countries without an adequacy decision it generally relies on the standard contractual clauses published by the European Commission.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: *We keep your emails for 24 months after our last contact with you, unless a contract or the law requires us to keep them longer.*

We keep your emails and the information in them for 24 months after our last contact with you. If our contact leads to a contract, or if information is needed for tax or accounting requirements or to establish, exercise, or defend legal claims, we keep it for as long as that purpose or the law requires. We do not set how long GitHub keeps the technical data it logs; GitHub describes its practices in its privacy statement, linked in section 4.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal

information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. HOW DO WE KEEP YOUR INFORMATION SAFE?

In Short: *We aim to protect your personal information through a system of organizational and technical security measures.*

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.

7. DO WE COLLECT INFORMATION FROM MINORS?

In Short: *We do not knowingly collect data from or market to children under 18 years of age or the equivalent age as specified by law in your jurisdiction.*

We do not knowingly collect, solicit data from, or market to children under 18 years of age or the equivalent age as specified by law in your jurisdiction. The Website is not directed at children. If we learn that personal information from users less than 18 years of age or the equivalent age as specified by law in your jurisdiction has been collected, we will take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18 or the equivalent age as specified by law in your jurisdiction, please contact us at info@sensia.bio.

8. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: *In some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information.*

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be subject to automated decision-making. If a decision that produces legal or similarly significant effects is made solely by automated means, we will inform you, explain the main factors, and offer a simple way to request human review. We do not make such decisions through the Website. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a

request by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the UK and are unhappy with how we have handled your personal information, you can make a complaint directly to us. This is in addition to the rights you have under the UK General Data Protection Regulation and the Data Protection Act 2018.

How to contact us:

- **Email: info@sensia.bio**
- **Post:** See "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

What happens after you complain:

- We will acknowledge your complaint within 30 days of receiving it.
- We will investigate without unjustifiable or excessive delay.
- We will keep you informed of progress and explain the outcome.

If you are not happy with our final response, you can refer your complaint to the Information Commissioner's Office, the UK supervisory authority:

- **Website:** ico.org.uk/make-a-complaint
- **Helpline:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your Member State data protection authority or UK data protection authority. In Italy, this is the Garante per la protezione dei dati personali (https://www.garanteprivacy.it).

If you are located in Switzerland, you may contact the Federal Data Protection and Information Commissioner.

Withdrawing your consent: If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?" below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you have questions or comments about your privacy rights, you may email us at info@sensia.bio.

9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Notice. The Website does not use tracking technologies in any case.

10. DO OTHER REGIONS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: *You may have additional rights based on the country you reside in.*

Australia and New Zealand

We collect and process your personal information under the obligations and conditions set by Australia's Privacy Act 1988 and New Zealand's Privacy Act 2020 (Privacy Act).

This Privacy Notice describes, in particular: what personal information we collect from you, from which sources, for which purposes, and other recipients of your personal information.

If you do not wish to provide the personal information necessary to fulfill its applicable purpose, it may affect our ability to provide our services, in particular:

- offer you the products or services that you want
- respond to or help with your requests

At any time, you have the right to request access to or correction of your personal information. You can make such a request by contacting us by using the contact details provided in the section "HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?" below.

If you believe we are unlawfully processing your personal information, you have the right to submit a complaint about a breach of the Australian Privacy Principles to the Office of the Australian Information Commissioner and a breach of New Zealand's Privacy Principles to the Office of New Zealand Privacy Commissioner.

11. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: *Yes, we will update this notice as necessary to stay compliant with relevant laws.*

We may update this Privacy Notice from time to time. The updated version will be indicated by an updated "Last updated" date at the top of this Privacy Notice. If we make material changes to this

Privacy Notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Notice frequently to be informed of how we are protecting your information.

12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at info@sensia.bio or contact us by post at:

Sensia
Via Giuseppe Ponzio 34
Milano, 20133
Italy

13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, details about how we have processed it, correct inaccuracies, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. To request to review, update, or delete your personal information, please email us at: info@sensia.bio.