

CallDoc Morocco — Patient Privacy Policy

PRIVACY POLICY — PATIENTS

MOROCCO

CALL DOC — How We Collect, Use, and Protect Your Health Data

Document Reference: CLDOC-PAT-PRIVACY-MA | Version 1.0 | April 2026

*This Privacy Policy is governed by the laws of the Kingdom of Morocco, including **Framework Law No. 06-22 on the national health system promulgated by Dahir No. 1-22-77 of December 9, 2022**, Law No. 131-13 (practice of medicine), Law No. 09-08 (Protection of Personal Data), Law No. 53-05 (Electronic Data Exchange), Law No. 31-08 (Consumer Protection), the Code of Medical Ethics (Decree No. 2-21-225 of June 17, 2021), the Code of Obligations and Contracts (DOC), the Penal Code, Decree No. 2-18-378 of July 25, 2018 (Practice of Telemedicine), Decree No. 2-20-675 of January 22, 2021 (partial amendment to Decree No. 2-18-378), and all applicable Moroccan laws and regulations.*

This Privacy Policy applies to any patient who registers on the CallDoc telemedicine platform (“Platform”), uses it, or receives medical services through it. It explains what personal and health data CallDoc collects about you, how it is used, with whom it may be shared, and what rights you have as a data subject under Moroccan law.

PART A — IDENTITY OF THE DATA CONTROLLER

1. Data Controller

The data controller for your personal and health data is:

Company Name: CALL DOC

Headquarters: APPT 15 IMM12 LOT SINE AV ALLAL FASSI, Marrakech, Morocco

ICE No.: 003900577000037

Data Protection Contact: privacy@calldoc.ma

CallDoc has registered its data processing activities with the National Commission for the Control of Personal Data Protection (CNDP), in accordance with the requirements of Law No. 09-08. A copy of the CNDP authorization is available upon written request.

PART B — PERSONAL AND HEALTH DATA COLLECTED

2. Categories of Data Collected

When you register and use the Platform as a patient, CallDoc collects the following categories of data:

2.1 Identity and Personal Data

- Full name, date of birth, CIN number
- Gender, nationality
- Email address and phone number
- Residential address

2.2 Health Data (Sensitive Data)

- Reason for consultation and reported symptoms
- Medical history, allergies, and current treatments
- Prescriptions, medical records, and test results shared during the consultation
- Data collected during video or audio consultations (only to the extent permitted by your explicit consent)

- Information regarding any disabilities or special needs you may have

2.3 Financial Data

- Payment information (credit card, bank transfer — processed by a PCI-DSS certified payment provider)
- Transaction history and invoices on the Platform

2.4 Platform Activity Data

- Connection timestamps, session durations, and IP addresses
- Consultation history (dates, times, doctor consulted — excluding clinical content that is part of the medical record)
- Messages sent via the Platform's internal messaging system

2.5 Technical Data

- Device type, browser, and operating system used to access the Platform
- Cookies and tracking data (see Article 11)

Legal basis: Law No. 09-08; Law No. 131-13

3. Sensitive Data — Processing of Health Data

Health data constitutes sensitive data within the meaning of Law No. 09-08. CallDoc processes your health data exclusively:

- With your prior explicit consent, given freely and in an informed manner
- For the purpose of providing you with the telemedicine services you have requested
- In strict compliance with medical confidentiality and the provisions of the Code of Ethics of the medical profession

Enhanced security measures (encryption, segregation, restricted access) are applied to all health data.

Legal basis: Law No. 09-08 (Art. 1 et seq.).

PART C — PURPOSES OF PROCESSING AND LEGAL BASES

4. Why We Process Your Data

CallDoc processes patients' personal data for the following purposes and on the following legal bases:

4.1 Performance of the Contract

- Creation and management of your patient account
- Connecting you with a qualified doctor and scheduling appointments
- Providing telemedicine services and processing payments
- Issuing invoices and consultation receipts

Legal basis: Law No. 09-08

4.2 Legal and Regulatory Compliance

- Compliance with medical record-keeping obligations under Law No. 131-13
- Compliance with reporting and authorization obligations to the CNDP
- Response to legal requests from competent judicial or regulatory authorities

Legal basis: Law No. 09-08

4.3 Legitimate Interests

- Ensuring the quality, safety, and continuity of telemedicine services
- Preventing fraud, abuse, and unauthorized access
- Improving the Platform’s functionality and user experience
- Generate anonymized statistical and operational reports

Legal basis: Law No. 09-08.

4.4 Processing Based on Consent

- Sending appointment reminders and communications related to your health (you may withdraw your consent at any time)
- Sending newsletters, promotional offers, or satisfaction surveys (optional)

Legal basis: Law No. 09-08

PART D — DATA SHARING AND INTERNATIONAL TRANSFERS

5. Sharing with Third Parties

CallDoc does not sell your personal or health information. Your information may be shared with the following categories of third parties, solely for the purposes described in this Policy:

- Platform partner physicians, to the extent strictly necessary to conduct your consultation
- Technical service providers (cloud hosting, cybersecurity, IT maintenance) bound by data processing agreements that impose equivalent protection standards
- Payment processors and financial institutions for the processing of your transactions
- The CNDP and other relevant Moroccan regulatory authorities, when required by law
- Legal professionals and auditors bound by professional confidentiality obligations

Your health data is never shared with insurers, employers, or commercial third parties without your explicit prior consent.

Legal basis: Law No. 09-08 (Art. 23 et seq.)

6. International Data Transfers

When CallDoc transfers your personal data to a third country (outside the Kingdom of Morocco), such transfer takes place only if:

- The destination country offers an adequate level of data protection recognized by the CNDP
- Appropriate contractual safeguards (such as standard contractual clauses approved by the CNDP) are in place with the recipient
- You have given your explicit consent to the transfer

By default, CallDoc processes patient data on servers located within the Kingdom of Morocco. You will be notified in advance of any cross-border transfer, unless otherwise required by law.

PART E — DATA SECURITY

7. Security Measures

CallDoc implements enhanced technical and organizational measures to protect your personal and health data against unauthorized access, disclosure, alteration, or destruction. These measures include:

- End-to-end encryption of data in transit (TLS/SSL) and at rest (AES-256)
- Role-based access controls limiting access to data to authorized healthcare or administrative staff only
- Multi-factor authentication for patient and administrator accounts
- Regular security audits, penetration tests, and vulnerability assessments
- Incident response protocols compliant with the requirements of Law No. 09-08

Legal basis: Law No. 09-08 (Art. 23 et seq.); Law No. 53-05 (Art. 6 et seq. / Article 417-3 of the Code of Obligations and Contracts)

8. Notification of Data Breaches

In the event of a personal data breach that poses a risk to your rights or health, CallDoc will notify you without undue delay and no later than seventy-two (72) hours after becoming aware of it. The notification will describe the nature of the breach, the data involved, and the corrective measures taken or planned. CallDoc will also notify the CNDP in accordance with Law No. 09-08.

PART F — DATA RETENTION

9. Retention Periods

CallDoc retains your personal and health data only for as long as necessary for the purposes for which it was collected, or as required by applicable Moroccan law. The following indicative retention periods apply:

- Medical records and consultation data: Ten (10) years from the last consultation, in accordance with legal obligations regarding the maintenance of medical records
- Financial records and transactions: Ten (10) years, in accordance with Moroccan accounting and tax law (Article 211 of the CGI)
- Activity and Platform access logs: Three (3) years
- Communication records (internal messaging): Two (2) years
- Data processed on the basis of consent: Until consent is withdrawn, after which the data is deleted within thirty (30) days

Upon expiration of the applicable retention period, personal data is securely deleted or irreversibly anonymized. Anonymized and aggregated data may be retained indefinitely for statistical and research purposes.

Legal basis: Law No. 09-08 (Art. 5); Moroccan General Tax Code (requirements for retaining financial documents).

PART G — YOUR RIGHTS AS A DATA SUBJECT

10. Rights under Law No. 09-08

As a patient whose data is processed by CallDoc, you have the following rights under Law No. 09-08:

10.1 Right of Access (Art. 7)

You have the right to request confirmation that CallDoc holds personal data about you and to receive a copy of it, as well as information regarding its source, purposes, and recipients. You may also request access to your medical record created in connection with consultations conducted via the Platform.

10.2 Right to Rectification (Art. 8)

You have the right to request the correction of any inaccurate or incomplete personal data concerning you.

10.3 Right to Erasure (Art. 8)

You have the right to request the deletion of your personal data when it is no longer necessary for the purposes for which it was collected, or when you have withdrawn your consent, subject to applicable legal retention obligations (including the minimum retention periods for medical records).

10.4 Right to Object (Art. 9)

You have the right to object to the processing of your personal data based on legitimate interests, including profiling. If your objection is upheld, CallDoc will cease the relevant processing, unless it can demonstrate compelling legitimate grounds.

10.5 Right to Withdraw Consent

When processing is based on your consent, you may withdraw it at any time by contacting privacy@calldoc.ma or via your account settings on the Platform. Withdrawal of consent does not affect the lawfulness of processing carried out prior to such withdrawal.

To exercise any of the above rights, please submit a written request to: privacy@calldoc.ma. CallDoc will respond within thirty (30) calendar days. If you are not satisfied with CallDoc's response, you have the right to file a complaint with the CNDP (www.cndp.ma).

PART H — COOKIES AND TRACKING TECHNOLOGIES

11. Use of Cookies

The CallDoc Platform uses cookies and similar tracking technologies to ensure a secure connection, maintain session integrity, and analyze usage patterns. The following categories of cookies are used:

- **Strictly Necessary Cookies:** Essential for authentication, security, and core Platform functionality. They cannot be disabled.
- **Performance cookies:** collect anonymized data on how patients use the Platform (e.g., loading times, navigation patterns). Used to improve the Platform's performance.
- **Functional cookies:** remember your preferences, such as language selection and display settings.

CallDoc does not use third-party advertising or marketing cookies on the Platform's patient-facing pages. You can manage your cookie preferences through your browser settings, subject to the limitations applicable to strictly necessary cookies.

Legal basis: Law No. 09-08 and CNDP Resolution No. D-939-2025

PART I — POLICY UPDATES

12. Changes to the Policy

CallDoc reserves the right to update this Privacy Policy at any time to reflect changes in applicable law, recommendations from the CNDP, or its data processing practices. You will be notified of any material changes via email and/or through a notification on the Platform at least thirty (30) days before they take effect. Your continued use of the Platform following such notification constitutes acceptance of the updated Policy.

The current version of this Privacy Policy is always available in your Patient Area on the Platform.

PART J — CONTACT AND COMPLAINTS

13. Data Protection Contact

For any questions, concerns, or requests regarding this Privacy Policy or the processing of your personal data, please contact:

Email: privacy@calldoc.ma

Mailing Address: CALL DOC — APPT 15 IMM12 LOT SINE AV ALLAL FASSI, Marrakech, Morocco

Response time: Within 30 calendar days of receipt

If you believe your data protection rights have been violated and CallDoc has not resolved your concern satisfactorily, you have the right to file a formal complaint with the CNDP:

National Commission for the Supervision of Personal Data Protection (CNDP)

Website: www.cndp.ma | Email: contact@cndp.ma | Address: Avenue AL ARZ, Sector 4, M1, HAY RIAD, Rabat, Morocco

PATIENT ACKNOWLEDGMENT

CALL DOC — Patient Privacy Policy

By registering on the CallDoc Platform or receiving medical services through it, you confirm that you have read, understood, and accepted this Patient Privacy Policy.

- I have read and understood CallDoc’s Patient Privacy Policy.**
- I consent to the processing of my health data for the purpose of conducting medical consultations via the Platform.**
- I consent to receiving appointment reminders and health-related communications from CallDoc. (Optional — you may withdraw your consent at any time.)

Patient’s Full Name: _____

Date of Birth: _____

Signature: _____

Date: _____

*This Privacy Policy is governed by the laws of the Kingdom of Morocco. In the event of a dispute, the competent courts of Casablanca **shall have exclusive jurisdiction** unless the dispute is settled amicably within a maximum period of **two (2) months**.*

CallDoc – Morocco / Law No. 06-22 / Law No. 131-13 / Law No. 09-08 / Law No. 53-05 / Law No. 31-08 / Code of Medical Ethics / Decree No. 2-18-378 / Decree No. 2-20-675 / CGI / DOC / Penal Code