

PRIVACY POLICY FOR HEALTHCARE PROFESSIONALS MOROCCO

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

Document Reference: CLDOC-PHY-PRIVACY-MA | Version 1 – June 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. 08-12 on the National Medical Association, promulgated by Dahir No. 1-15-26 of February 19, 2015; 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), Law No. 17-97 promulgated by Dahir No. 1-00-19 of February 15, 2000, Law No. 2-00 promulgated by Dahir No. 1-00-20 of February 15, 2000, Law No. 34-05 promulgated by Dahir No. 1-06-192 of February 14, 2006, the Code of Ethics for the Medical Profession (Decree No. 2-21-225 of June 17, 2021), the Code of Obligations and Contracts (DOC), the Penal Code, the General Tax Code (CGI), Decree No. 2-18-378 of July 25, 2018 (Practice of Telemedicine), Decree No. 2-20-675 of January 22, 2021, and all applicable Moroccan laws and regulations.

This Privacy Policy forms part of the contractual framework applicable to healthcare professionals using the CALL DOC platform, alongside the Partnership Agreement, the General Terms of Use (GTU), the Charter of Good Medical Practices, and the General Terms and Conditions for Physicians.

It describes the procedures for collecting, using, storing, protecting, and processing the personal data of healthcare professionals in accordance with applicable Moroccan regulations.

This Privacy Policy applies to all physicians registered with the CNOM who sign up for the CALL DOC telemedicine platform ("Platform"), use it, or provide services through it. It explains what personal and professional data CALL DOC 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 professional data is:

Company Name: CALL DOC

Legal form: Limited Liability Company (SARL)

Share capital: 100,000.00 MAD

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

Commercial Registry No.: 177405 — Marrakech Commercial Court

ICE No.: 003900577000037

Tax ID: 71823866

Phone: +212 6 95 18 80 33

Data Protection Contact: privacy@calldoc.ma

CALL DOC complies with all required formalities with the National Commission for the Supervision of Personal Data Protection (CNDP), in accordance with applicable Moroccan regulations.

PART B — PERSONAL AND PROFESSIONAL DATA COLLECTED

2. Categories of Data Collected

When you register and practice as a physician on the Platform, CALL DOC collects the following categories of data:

2.1 Identity and Professional Data

- Full name, date of birth, CIN number

- CNOM registration number and medical specialty
- Information regarding regulatory compliance with telemedicine requirements (Decree No. 2-18-378 and Decree No. 2-20-675)
- Copies of diplomas, CNOM registration number, and professional certifications
- Information on professional liability insurance policy

2.2 Contact Information and Location

- Business address, affiliation with a clinic or hospital
- Email address and phone number
- Languages spoken during consultations

2.3 Financial and Banking Information

- Bank account information (RIB/IBAN) for payment processing
- Tax ID number (IF/ICE) for billing purposes
- Earnings history and payment statements on the Platform

2.4 Activity Data on the Platform

- Connection timestamps, session durations, and IP addresses
- Viewing history (dates, times, durations—excluding clinical content, which constitutes patient data)
- Performance metrics and quality assessments on the Platform
- Communications 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

CALL DOC does not collect sensitive personal data concerning physicians (such as health data or criminal records) unless strictly required by law or for verification purposes during registration (e.g., confirmation of the absence of active CNOM sanctions). When such data is processed, CALL DOC seeks your prior explicit consent and implements enhanced security measures.

Legal basis: Law No. 09-08.

PART C — PURPOSES OF PROCESSING AND LEGAL BASES

4. Why We Process Your Data

CALL DOC processes physicians' personal data for the following purposes and on the following legal bases:

4.1 Performance of the Contract

- Registration and verification of your degrees and professional qualifications
- Providing and managing your access to the Platform
- Processing compensation and issuing payment statements
- Management of your schedule and assigned appointments

Legal basis: Law No. 09-08

4.2 Legal and Regulatory Compliance

- Verification of registration with the CNOM and regulatory compliance

- Compliance with reporting and authorization obligations with the CNDP
- Responding to legal requests from judicial or regulatory authorities
- Retention of records required by Law No. 131-13 and DMCM regulations

Legal basis: Law No. 09-08

4.3 Legitimate Interests

- Ensuring the quality and security of telemedicine services provided via the Platform
- Preventing fraud, abuse, and unauthorized access
- To improve the Platform's features, user experience, and clinical tools
- To produce anonymized statistical and operational reports

Legal basis: Law No. 09-08.

4.4 Processing Based on Consent

- Sending Platform updates, clinical resources, and professional development communications (you may withdraw your consent at any time)
- Publication of your professional profile (name, specialty, languages) in the directory accessible to patients

Legal basis: Law No. 09-08

PART D — DATA SHARING AND INTERNATIONAL TRANSFERS

5. Sharing with Third Parties

CALL DOC does not sell your personal data. Your data may be shared with the following categories of third parties, exclusively for the purposes described in this Policy:

- Technical service providers (cloud hosting, cybersecurity, IT maintenance) bound by data processing agreements that require equivalent protection standards
- Payment processors and financial institutions for the administration of compensation
- The CNDP and other relevant Moroccan regulatory authorities, when required by law
- The CNOM in cases involving regulatory audits or disciplinary proceedings
- Legal professionals and auditors bound by professional confidentiality obligations

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

6. International Data Transfers

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

- The destination country provides 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, CALL DOC processes physicians' 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

CALL DOC implements appropriate technical and organizational measures to protect physicians' 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 that restrict access to data to authorized personnel only
- Multi-factor authentication for administrator and physician 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 professional status, CALL DOC 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. CALL DOC will also notify the CNDP in accordance with Law No. 09-08.

PART F — DATA RETENTION

9. Retention Periods

CALL DOC retains physicians' personal 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:

- Professional diplomas and registration documents: The duration of the physician's active registration on the Platform, plus five (5) years following the termination of the service agreement
- Financial and compensation records: Ten (10) years, in accordance with Moroccan accounting and tax law (Article 211 of the General Tax Code)
- 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 physician whose data is processed by CALL DOC, 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 CALL DOC holds personal data about you and to receive a copy of such data, as well as information regarding its source, purposes, and recipients.

10.2 Right to Rectification (Art. 8)

You have the right to request the correction of any inaccurate or incomplete personal data concerning you. For data affecting professional licensing (e.g., CNOM number, specialty), corrections are subject to verification.

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.

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, CALL DOC will cease the processing in question, 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 through 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. CALL DOC will respond within thirty (30) calendar days. If you are not satisfied with CALL DOC'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 CALL DOC 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 the Platform's core functionality. They cannot be disabled.
- **Performance cookies:** Collect anonymized data on how doctors use the Platform (e.g., load times, navigation patterns). Used to improve the Platform's performance.
- **Functional cookies:** remember your preferences, such as language selection, scheduling, and display settings.

CALL DOC does not use third-party advertising or marketing cookies on the Platform's pages intended for physicians. 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 — DIRECTORY OF PROFESSIONAL PROFILES

12. Listing in the Directory

With your consent, CALL DOC may display a professional profile about you in the directory of physicians accessible to patients. This profile may include your name, medical specialty, languages in which you provide consultations, years of experience, and availability. No financial data, CIN number, or CNOM registration number will be visible to patients.

You may request the removal or modification of your public profile at any time by contacting privacy@calldoc.ma. Your profile will be removed within five (5) business days of your request, unless there is a Platform malfunction; in such cases, the timeframe begins once the Platform is back online.

PART J — POLICY UPDATES

13. Changes to the Policy

CALL DOC reserves the right to update this Privacy Policy applicable to healthcare professionals at any time to reflect changes in applicable law, CNDP recommendations, or its data processing practices. Substantial changes will be communicated to you by email and/or via a notification on the Platform at least thirty (30) days before they take effect. Your continued use of the Platform following such notification constitutes your acceptance of the updated Policy.

The current version of this Privacy Policy for Healthcare Professionals is always available on your Physician Dashboard on the Platform.

PART K — CONTACT AND COMPLAINTS

14. Data Protection Contact

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

Email: privacy@calldoc.ma

Phone: +212 6 95 18 80 33

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 that your data protection rights have been violated and that CALL DOC has not satisfactorily resolved your concern, 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

ACCEPTANCE OF THE PRIVACY POLICY

By registering on the CALL DOC Platform or by providing services on it, you confirm that you have read, understood, and accepted this Privacy Policy applicable to healthcare professionals.

- ☐ I have read and understood CALL DOC's Privacy Policy for Healthcare Professionals.
- ☐ I consent to the processing of my professional profile data for display in the directory accessible to patients.
- ☐ I consent to receiving updates from the Platform, clinical resources, and professional development communications from CALL DOC. (Optional—you may withdraw your consent at any time.)

Physician's Full Name: _____

CNOM Registration Number: _____

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.

CALL DOC – Morocco / Law No. 06-22 / Law No. 08-12 / Law No. 131-13 / Law No. 09-08 / Law No. 53-05 / Law No. 31-08 / Law No. 17-97 / Law No. 2-00 / Law No. 34-05 / Decree No. 2-18-378 / Decree No. 2-20-675 / Code of Medical Ethics / CGI / DOC / Penal Code