

## Personal Data Protection Policy

Medsquare undertakes, within the framework of its activities and in accordance with the legislation in force in France and Europe, to ensure the protection, confidentiality and security of the personal data of your personnel and to respect their privacy.

This policy informs you about how Medsquare and its subcontractors treat your personal data.

This policy may be supplemented by specific information made known to the persons concerned.

### **What type of data are being processed?**

Medsquare deals with 2 categories of personal data:

- The data of its customers' employees
  - Identification data: Surname, first name
  - Professional contact data: address, e-mail, phone number
  - Occupation
- Patient data: In this case, Medsquare acts as a subcontractor. The processing of these data is limited to the ability to access these data through services performed in the framework of executing a contract with health facilities. In no case does Medsquare keep these data.

Depending on the case, Medsquare processes your personal data, which are collected directly from you or from your colleagues. Medsquare is also likely to be the recipient of data that have been collected from you by a third party.

Medsquare processes data, or a category of data, only if this is strictly necessary to the purpose being pursued within the framework of its activities.

### **Why does Medsquare process your data?**

Medsquare processes your personal data only for specific, explicit, and legitimate purposes as part of the performance of a contract.

Medsquare treats these data in consonance with these purposes.

The purposes pursued by Medsquare are as follows:

- To manage the customer relationship (orders, invoices, after-sales service, ...)

- To ensure the installation and commissioning of commercialized solutions as well as the after-sales support

Your data are kept for the time necessary to fulfill the above-mentioned purposes. Medsquare also processes your data to meet its legal or regulatory obligations. In this case, your data can be kept as long as necessary for Medsquare to respond to its legal obligations.

### Who are the receivers of your data?

The data collected are intended for Medsquare's internal services and subcontractors.

The processed data may be transmitted to the competent authorities, at their request, in the framework of judicial proceedings, in the context of judicial research and solicitations authorities, or to comply with other legal obligations.

### Are your data processed outside the EU?

The collected data may be processed outside the European Union. In that case, Medsquare makes the necessary arrangements with its subcontractors and partners to ensure an adequate level of protection of your data, and this in accordance with the applicable regulations.

If the subcontractors and partners concerned are located in a country that is considered incapable of providing adequate protection, they will then have signed the "standard contractual clauses" of the European Commission or will be subject to rules binding internal regulations approved by the authorities.

### What are your rights and how can you exercise them?

You have the right to access, rectify and delete data that concern you. You can request the portability of these data. You also have the right to oppose, or request the limitation of, the treatment of your data.

You can issue guidelines on the retention, deletion or communication of your personal data after the end of your contract with your employer (our customer).

You can exercise your rights at any time through the following process:

- Go to the [Contact Us](#) page of our website: [www.medsquare.com](http://www.medsquare.com)
- Fill in the required information (in the field "Message subject", select "Personal data")

A reply will be sent to you within 1 week of receipt of your request.

If your exchanges with Medsquare have not been satisfactory, you have the possibility to introduce a complaint to the French Data Protection Authority (CNIL), which is in charge of compliance with the obligations regarding personal data in France.

### **How is your data made secure?**

Medsquare ensures that your data is treated securely and confidentially, including when certain operations are carried out by subcontractors. For this purpose, the appropriate technical measures and organizational structures are put in place to prevent the loss, misuse, alteration or deletion of your personal data. These measures are adjusted according to the level of sensitivity of the processed data and according to the level of risk posed by their treatment or implementation.

### **Modification of the Data Protection Policy**

This Personal Data Protection Policy is subject to change.  
Last updated on 7 June 2019.