



|                          |
|--------------------------|
| <b>TABLE OF CONTENTS</b> |
|--------------------------|

## Table of contents

|   |   |
|---|---|
| PRIVACY NOTICE FOR WEBSITE USERS.....   | 2 |
| I.    What personal data do we collect? .....   | 2 |
| II.   Why do we use your personal data? .....   | 2 |
| III.  On what legal basis do we use your personal data? .....   | 3 |
| IV.  How long do we keep your personal data? .....  | 3 |
| V.   How are your personal data shared?.....  | 3 |
| VI.  How do we protect your data? .....   | 3 |
| VII. Your rights.....   | 3 |
| VIII. Contacts .....  | 4 |
| PRIVACY NOTICE FOR VISIBLE PATIENT CUSTOMERS / PROVIDERS / PROSPECTS .....  | 5 |
| I.    Why a Privacy notice?.....  | 5 |
| II.   What does it mean to process personal data? .....   | 5 |
| III.  Who is this Privacy notice intended for? .....  | 5 |
| IV.  Who is the data controller of your personal data?.....   | 6 |
| V.   What categories of data about you do we process? .....   | 6 |
| VI.  Why do we process your personal data? On what legal basis do we process your data? How long do we keep them? ..... | 7 |
| VII.  Is your data transferred outside the EEA/EU?.....   | 8 |
| VIII. What security measures does VP take to protect your personal data?<br>.....                                       | 8 |
| IX.  What are your rights and how can you exercise them? .....  | 8 |

## PRIVACY NOTICE FOR WEBSITE USERS

This Privacy Notice for users of the Website (hereinafter "Notice") applies to the processing of personal data related to the use of the Visible Patient website.

Visible Patient as Data controller of the processing of your personal data is committed to complying with the General Data Protection Regulation ("GDPR"), the Swiss Federal Act on Data Protection ("FADP") and all applicable data protection laws and regulations. Visible Patient wants to ensure that you understand what personal data is collected about you, how it is used and how it is kept secure.

### **General warning**

Access to the website <https://www.visiblepatient.com/> (hereinafter referred to as the "Website") implies full and unreserved acceptance by users of this Notice as well as its general terms of use and the Cookie notice.

The user acknowledges having read the information below and authorizes Visible Patient to process, in accordance with the Notice, the personal data he/she communicates on the Website.

The Notice applies to all pages hosted on the Website. It does not apply to pages hosted by third parties to which Visible Patient may refer and whose privacy notices may differ. Visible Patient cannot therefore be held responsible for any data processed on or by these websites.

### **I. What personal data do we collect?**

First name and last name, email address and additional personal data including possible personal information on health if you provide it voluntarily in our contact form.

#### ***Special case of the Professional Space / Download of VP Planning software***

First name and last name, email address, version of downloaded software, download country, exploitation system and download date.

### **II. Why do we use your personal data?**

We use your personal data to respond to requests and inquiries about Visible Patient or about our 3D model, which you submit to us by completing the form on the Website.

#### ***Special case of the Professional Space / Download of VP Planning software***

We use your data to comply with our legal obligations relating to the use of the VP Planning solution. We need to be able to contact you to pass on any new information relevant to the proper use of the version you have downloaded.

### **III. On what legal basis do we use your personal data?**

We consider that it is our legitimate interest to process the personal data that you have voluntarily provided to us in order to answer your questions and provide you with information about obtaining your 3D model.

#### *Special case of the Professional Space / Download of VP Planning software*

We use your data to comply with our legal obligations relating to the use of the VP Planning solution.

#### **IV. How long do we keep your personal data?**

We retain the personal data you have provided for as long as we have direct contact with you and if it is required to respond to your requests or queries, in the context of the services provided and for the corresponding legal retention period, for example the retention period for accounting documents is 10 years in France. We will delete them at the end of this period.

#### *Special case of the Professional Space / Download of VP Planning software*

We will keep your personal data for a period of time in accordance with the current legislation.

#### **V. How are your personal data shared?**

We only disclose your personal data to our suppliers and subcontractors to the extent necessary to achieve the purpose of the processing of your personal data. This includes, for example, OVH, our e-mail hosting provider.

All our suppliers and subcontractors are established in the European Economic Area (EEA).

The purpose of our Website is purely informative. From the moment you enter into a commercial relationship with us, you will be informed of any other processing carried out by Visible Patient and of any possible disclosure to other third parties.

#### **VI. How do we protect your data?**

Visible Patient treats your personal data as confidential and uses at least the same level of care to protect your personal data as it uses with its own confidential information of a similar nature.

Your personal data is contained in secure networks and is accessible only to a limited number of people who have special access rights to these systems and who are required to maintain the confidentiality of the information.

#### **VII. Your rights**

You have the following rights and options regarding the processing of your data:

- **Access.** You have the right to obtain confirmation as to whether your personal data is being processed and, if so, any information required to make the process transparent.
- **Rectification.** You have the right to request rectification of inaccurate data about you.
- **Deletion.** You have the right to request the deletion of your data.
- **Restriction of processing.** You have the right to restrict the processing of your data under certain specified circumstances.
- **Objection.** You have the right to object to the processing of your data at any time, for reasons related to your particular situation.

### ***Special case of the Professional Space / Download of VP Planning software***

Because of Visible Patient's legal obligations, you cannot exercise your right to deletion or your right to object to the processing.

If you wish to exercise one or more of these rights, please inform us by contacting our DPO, [Visiblepatient.dpo@mydata-trust.info](mailto:Visiblepatient.dpo@mydata-trust.info); +33 9 70 70 20 09. Please note that none of the above rights and options are absolute. Your requests will be analyzed on a case-by-case basis by our DPO.

You also have the right to lodge a complaint with the Data Protection Authority in your country or with the Data Protection Authority where the alleged infringement occurred.

As a Swiss data subject, you also have the right to lodge a civil complaint if you believe that your personality has been violated, in particular with regard to a violation of your right of access, rectification and opposition, but also with regard to a violation of the principles of the FADP.

## **VIII. Contacts**

### **Visible Patient**

8 Rue Gustave Adolphe Hirn  
67000 Strasbourg  
France  
Email address: [contact@visiblepatient.com](mailto:contact@visiblepatient.com)

### **Data Protection Officer**

MyData-Trust SA.  
Boulevard Initialis 7/3  
7000 Mons  
France  
+33 9 70 70 20 09  
[Visiblepatient.dpo@mydata-trust.info](mailto:Visiblepatient.dpo@mydata-trust.info)

### **Data Protection Authority**

Commission Nationale de l'Informatique et des Libertés (CNIL)  
Place de Fontenoy 3,  
TSA 80715,  
75334 PARIS CEDEX 07,  
France  
Tél : +33 1 53 73 22 22

[https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

Préposé Fédéral à la Protection des Données et à la Transparence (PFPDT)  
Feldeggweg 1  
CH-3003 Berne

Tél : +41 (0)58 462 43 95  
Fax : +41 (0)58 465 99 96

<https://www.edoeb.admin.ch/edoeb/fr/home/adresse.html>

# PRIVACY NOTICE FOR VISIBLE PATIENT

## CUSTOMERS / PROVIDERS / PROSPECTS

### I. Why a Privacy Notice?

VISIBLE PATIENT, as the Data Controller for the processing of your personal data, attaches great importance to respecting your privacy and is committed to protecting your personal data.

VISIBLE PATIENT ("VP") wishes to inform you of the way your personal data is collected and processed by means of this Privacy Notice dedicated to our customers/suppliers/prospects (hereinafter referred to as the "Notice"). The purpose of this Notice is to ensure that your personal data is adequately and responsibly protected and managed in compliance with applicable legislation, in particular in accordance with the General Data Protection Regulation of Personal Data (hereinafter, "the GDPR") and the Swiss Federal Act on Data Protection ("FADP").

### II. What does it mean to process personal data?

- **Personal data** is any information of any kind, regardless of its support, that directly or indirectly identifies a natural person. Thus, your last name, first name, e-mail address and any other data required for the performance of the contract between us are deemed as personal data.
- The **processing of personal data** is defined as any act of manipulation or exploitation of personal data, such as collection, use, recording, storage, communication, dissemination, modification, deletion or anonymization.

### III. Who is this Privacy Notice intended for?

This Notice is intended for customers, prospects, suppliers and any other person likely to be in a contractual relationship with VP as part of the management of its commercial activity.

Consequently, this Notice is intended to apply to the processing carried out for the purposes of managing commercial activities, whether implemented using in-house tools or outsourced to a service provider, and which leads to the collection of data relating to natural persons.



VISIBLE PATIENT

#### IV. Who is the data controller of your personal data?

VP acts as the data controller of your personal data, i.e. it determines the purposes and means for which it processes your data. In this sense, it is responsible for processing and protecting your personal data in compliance with applicable legislation and more specifically in compliance with the GDPR and the Swiss FADP.

VISIBLE PATIENT's address is 8 rue Gustave Adolphe HIRN 67000 Strasbourg France.

VP has appointed a Data Protection Officer (DPO or advisor) who can be contacted at the following address: [visiblepatient.dpo@mydata-trust.info](mailto:visiblepatient.dpo@mydata-trust.info).

#### V. What categories of data about you do we process?

To perform the contract, we collect and process a range of data that you have provided us. This also includes data collected during pre-contractual contacts, particularly during the negotiation phase.

The categories of data collected about you and processed by VP may be as follows:

- **Identification data:** title, last name or company name, first names, address (including registered office, billing address), telephone number, fax number, e-mail addresses, internal processing code for customer identification, accounting identification code, SIREN number.
- **Contact data:** business e-mail address, business postal address, business telephone number.
- **Professional data:** current job.
- **Settlement/payment data:** Payment, terms and conditions of payment (e.g. discounts, down payments, rebates), RIP/RIB, check number, credit card number, credit card expiry date, visual cryptogram, credit terms, duration, payment method used, transaction number, details of the purchase, of the subscription, of the good or service subscribed to.
- **Transaction data:** Transaction number, details of the purchase, of the subscription, of the good or service subscribed to.
- **Data relating to commercial relations:** Documentation requests, articles, products purchased, services ordered and invoiced, quantity, amount, frequency, date and amount of order and invoice, invoice due date, delivery conditions and address, purchase and service history, origin of sale (vendor, representative, partner, affiliate) / Order, invoices, correspondence with customer and after-sales service, exchanges and comments from customers and prospects, person(s) in charge of customer relations.
- **Data for solicitation purposes:** Data required for prospecting, research, surveys and promotional activities.

This data is collected directly from you by authorized VP personnel.

If you do not provide your data, we may not be able to fulfill our obligations in certain cases. Where appropriate, we will inform you of the consequences of not providing this data.



VISIBLE PATIENT

**VI. Why do we process your personal data? On what legal basis do we process your data? How long do we keep them?**

In general, the data we process about you is used exclusively for contract management and prospecting purposes. It will be used to manage our relationship with you effectively, lawfully and appropriately, whether at the time of negotiation, during the performance of the contract, at the time of termination of the contract or after termination of the contract

In particular, your data is processed for the following purposes:

| <i>Purposes</i>  | <i>Legal basis</i>  | <i>Retention period</i>   |
|--|---|---|
| <b>Contract management</b>   |   |   |
| Orders, deliveries, after-sales service                                    | Execution of the contract   | Duration of the contractual relationship (except for data processed for purposes related to accounting obligations as described in Article L. 123-22 paragraph 2 of the French Commercial Code) |
| Accounting and tax obligations, etc.                                       | Compliance with a legal obligation to retain data (e.g.: obligation to verify the identity of the person by requesting proof of identity) | As an intermediate archive: legal retention period (e.g.: 10-year accounting obligation)  |
| Pre-litigation and litigation management                                   | Legitimate interest of the organization in establishing proof of a right or contract  | Duration of limitation period (civil, commercial, etc.)   |
| <b>Prospecting activities</b>  |   |   |
| By electronic means (for the purpose of sending e-mail, SMS, talker, etc.) | Consent   | Until consent withdrawal or 3 years from the last contact   |
| By post or human intervention  | Legitimate interest of the organization, subject to allowing individuals to object beforehand and at any time                             |   |
| For professionals  |   |   |
| For goods or similar services  |   |   |
| <b>Data transfer</b>   |   |   |
| Electronic data (for the purpose of sending e-mail, SMS, talker, etc.)     | Consent   | Until consent withdrawal  |

**VII. Who processes your personal data and with whom do we share them?**

Your personal data is only accessed and processed by persons authorized to do so and in accordance with their duties within VP. These persons are made aware of the confidentiality and security of the personal data, as well as their legitimate use. Access authorizations are documented and are subject to traceability measures.

For the purposes set out above, your personal data may also be shared with:

- Our administrative/financial department and heads/managers of departments;
- Management of VP;
- Any authority to which we are legally obliged to disclose your data (e.g. social and tax authorities);
- VP affiliates, third parties, partners or subcontractors (technical service providers) working under VP's responsibility;
- Service providers specializing in tax matters;
- Bailiffs;
- Banking organizations.

## **VIII. Is your data transferred outside the EEA/EU?**

Some of the recipients of your personal data may be located outside the European Union (EU), the European Economic Area (EEA) or Switzerland, where data protection measures may be less stringent. In such cases, VP undertakes to transfer your data considering existing adequacy decisions. If the country in which the recipient is located does not benefit from an adequacy decision, VP undertakes to put in place appropriate safeguards such as standard contractual clauses.

## **IX. What security measures does VP take to protect your personal data?**

All necessary measures are taken to preserve the security of your personal data at the time of collection, transmission and storage, in order to improve the accuracy and completeness of the data recorded. Furthermore, technical and organizational measures are taken on a daily basis to ensure the accuracy and relevance of your personal data and to protect it against loss, damage and unauthorized access, modification or transfer.

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

As a data subject, you have a number of rights concerning the processing of your personal data.

Subject to our legal obligations and a case-by-case analysis by our DPO, you can exercise the following rights and options:

- Right of access: you have the right to obtain confirmation as to whether your personal data is processed by VP and, if so, you may obtain precise information as to the processing(s) of your data. You also have the right to request a copy of all information held about you.
- Right of rectification: you have the right to ask us to rectify, in particular by completing or modifying, all or part of the information held about you.
- Right to erasure ("right to be forgotten"): you have the right to ask us to delete from our systems any information held about you.
- Right to restrict processing: you can ask us not to process some of your data. This is known as "blocking" your data.
- Right to data portability: you can ask us to recover your data in a structured, commonly used and machine-readable format, so that you can transfer it to other data controllers.
- Right to object: you may object to the processing of your personal data.
- Right to withdraw your consent: If you have given your consent to the processing of data, you have

the right (where applicable) to withdraw it at any time without, however, affecting the lawfulness of the processing for which you wish to withdraw it.



If you wish to exercise any of your rights, please contact the e-mail addresses below, providing proof of your identity and clearly indicating the right(s) you wish to exercise:

- You are a supplier: VP **accounting department** ([accounting@visiblepatient.com](mailto:accounting@visiblepatient.com))
- You are a customer: **Commercial department** ([info@visiblepatient.com](mailto:info@visiblepatient.com))

Please note that these rights are not absolute. They will always be analyzed on a case-by-case basis by our DPO, whom you can also contact directly ([visiblepatient.dpo@mydata-trust.info](mailto:visiblepatient.dpo@mydata-trust.info)) with any questions or requests. You also have the right to lodge a complaint with the Data Protection Authority of the European Union Member State of your habitual residence, place of work or place of the alleged infringement if you believe that your personal data is not being processed in accordance with the GDPR or the FADP.

As a Swiss data subject, you also have the right to file a civil complaint if you believe that your personality has been violated, in particular, with regard to a violation of your right of access, rectification and opposition but also a violation of the principles of the FADP.

You can find the contact details of the various European Data Protection Authorities via the following link: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

*The contact details of the Swiss data protection authority are as follows:*

*Préposé Fédéral à la Protection des Données et à la Transparence (FPDPT)*

*Feldeggweg 1*

*CH-3003 Berne*

*Phone : +41 (0)58 462 43 95*

*Fax : +41 (0)58 465 99 96*

*<https://www.edoeb.admin.ch/edoeb/fr/home/adresse.html>*

*This Privacy notice enters into force from 1<sup>st</sup> February 2022.*

*Date of latest update: 2023 10 20.*

*The present document may be modified in line with operational requirements or changes in legal obligations. The latest version will always be available on the intranet. It can also be obtained on simple request from the Accounting or Sales departments.*