

# Privacy Statement Document

## Keunen Medical Software BV

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### Preface

This is the Privacy Statement of Keunen Medical B.V. We may amend this Privacy Statement to remain compliant with any changes in law and/or to reflect how our business processes personal data. This version was created on May 25, 2018. From May 25, all EU countries will protect you privacy according to the same rules. A great opportunity for Keunen Medical to use one Privacy Statement worldwide. In our Privacy Statement we explain what personal data we collect and how we process it. The Privacy Statement is available via a link on the website of Keunen Medical.

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## Purpose of this Privacy Statement.

This Privacy Statement aims to explain in a simple and transparent way what personal data we gather about you and how we process it. It applies to the following people:

- All past, present and prospective Keunen Medical customers. We are legally obliged to retain personal data about you, also for a certain period once the relationship has ended, in compliance with 'know your customer' regulations.
- Anyone involved in any transaction with Keunen Medical, whether it's in your personal capacity or as a representative of a legal entity (for example, a company manager, agent, legal representative, operational staff, etc.).
- Non-Keunen Medical customers such as payees or the contact persons of corporate clients.
- The Netherlands: Are you an independent contractor or do you operate a sole proprietorship, general partnership or professional partnership? Then you are seen as a natural person and the data involved are also ones that directly or indirectly say something about you. Dit Privacy Statement is bedoeld om op een eenvoudige en heldere manier uit te leggen welke persoonsgegevens we over u verzamelen en hoe we deze verwerken.

Personal data refers to any information that tells us something about you or that we can link to you. This includes your gender, name, address, account number, email address, website, profession, hospital.

You share personal information with us when you become a customer, register with our online services, complete an online form, sign a contract, use our products and services or contact us through one of our channels. We also use data that is legally available from public sources such as publications in books, journals and other electronic media.

By processing we mean everything we can do with this data such as collecting it, recording, storing, adjusting, organising, using, disclosing, transferring or deleting

## What personal data do we process?

The personal data we process includes:

- **Identification data**, such as your name, surname, date and place of birth, ID number (BSN), email address and the IP address of your PC or mobile device.
- **Transaction data**, in case you purchase products or services of Keunen Medical. Transaction data include bank account number and transfers related to your account.
- **Financial data**, such as invoices, credit notes and payment behaviour.
- **Online behaviour and preferences data**, such as the IP address of your mobile device or computer and the pages you visit on Keunen Medical websites and apps.
- **Data about to your interests and needs** that you share with us, for example when you contact our call centre or fill in an online survey.
- **Data about our activities to supply you're demands**

### Note

We do not record sensitive data relating to your health, criminal data, ethnicity, religious or political beliefs.

## What we do with personal data?

We only use your personal data under one of the following legal grounds:

- To conclude and carry out delivery of our product and services to you.
- To comply with our legal obligations.
- For our legitimate business interests. This data processing may be necessary to maintain good commercial relations with all our customers and other concerned parties, to prevent and combat fraud and to maintain the security of the operations made by Keunen Medical.

## Who we share data with and why?

To be able to offer you the best possible services and remain competitive in our business, we share certain data internally and outside of Keunen Medical. This includes:

### **Independent agents**

We share information with independent agents who act on our behalf. These agents are registered in line with local legislation and operate with due permission of regulatory bodies.

### **With other companies: if you request it (The Netherlands)**

If you wish, we pass on your personal data to other companies as well. In these kinds of situations, you always personally give an instruction and permission for us to share your personal data. When we have your consent, you may withdraw your consent at any time.

### **Note**

Whenever we share your personal data internally or with third parties in other countries, we ensure the necessary safeguards are in place to protect it. For this, Keunen Medical relies on:

- Binding Corporate Rules as defined in EC Regulation (EU) 2016/679. These are known as the ING Global Data Protection Policy (GDPP) and have been approved by the data protection authorities in all EU member states.
- [EU Model clauses](#), which are standardised contractual used in agreements with service providers to ensure personal data transferred outside of the European Economic Area complies with EU data protection law.
- [Privacy Shield](#) framework that protects personal data transferred to the United States.

## Using you're rights.

If your personal data is processed, you also have privacy rights. Of course we respect them. The more specific you are with your application, the better we can handle your question. We can ask you for a copy of your ID. We do this to ensure that someone else does not exercise your rights.

We aim to respond to your request as quickly as possible. In some instances this could take up to one month (if legally allowed). Should we require more time to complete your request, we will let you know how much longer we need and provide reasons for the delay.

In certain cases, we may deny your request. If it's legally permitted, we will let you know in due course why we denied it.

Your rights include:

### **Right to access: an overview of your personal data**

You have the right to ask us for an overview of your personal data that we process. That is called the 'Right to access'. The purpose of this right is that you can check whether your data is accurate and complete. Then you can adjust the data if necessary.

Do you have questions about personal data? Then you can send us a email to [info@embolusdetection.com](mailto:info@embolusdetection.com). Enclose a copy of your valid passport, driving licence or other proof of identity with your letter

### **Right to rectification: correct your personal data**

If your personal data is incorrect or incomplete, you have the right to ask us to rectify it. Do you want a rectification about personal data? Then you can send us a email to [info@embolusdetection.com](mailto:info@embolusdetection.com). Enclose a copy of your valid passport, driving licence or other proof of identity with your letter.

### **Right to object to processing because of personal circumstances**

Keunen Medical may use your information to comply with a contract, due to legal obligations, based on your consent and on the 'legitimate interest of Keunen Medical'. The legitimate interest often involves activities that ensure that Keunen Medical as a company can function well and can continue to exist. We ensure that you can read what we do in the Privacy Statement. And we make the consequences for your privacy as small as possible.

You may find that your personal circumstances outweigh Keunen Medical legitimate interest in using your data. You then have the right to object. You can send us a email to [info@embolusdetection.com](mailto:info@embolusdetection.com). Enclose a copy of your valid passport, driving licence or other proof of identity with your letter. Please give a short explanation why you want to make use of this right.

We will process your objection and investigate whether the processing of your data has such an impact on you that we have to stop this processing.

**Good to know:** You cannot object to us processing your personal data if we are legally required to do so; for instance we have to store legally invoices and signed contract of completed delivery of our products.

## **Right to object to personal offers**

We like to keep you abreast of our products and services. If necessary we will ask your consent on forehand. This consent you can always withdraw.

If you would prefer not to see any personal offers, no problem. You also have the right to object to direct marketing. So do you want to use your right to object and stop the use of your personal data to make personal offers? And prevent your data from being used for direct marketing profiles? You can send us a email to [info@embolusdetection.com](mailto:info@embolusdetection.com). Enclose a copy of your valid passport, driving licence or other proof of identity. Right to object to automated decisions

## **Right to restrict processing**

You have the right to ask us to restrict using your personal data if

- you believe the information is inaccurate
- we are processing the data unlawfully
- you have objected to us processing your data for our own legitimate interests

You can ask us to restrict the processing of your data. You can send us a email to [info@embolusdetection.com](mailto:info@embolusdetection.com). Enclose a copy of your valid passport, driving licence or other proof of identity. Right to object to automated decisions Enclose a copy of your valid passport, driving license or other proof of identity with your letter.

## **Right to data portability: transfer your personal data**

You have the right to ask us to transfer your personal data directly to you. This applies to personal data we process by automated means and with your consent or on the basis of a contract with you. Where technically feasible, we will transfer your personal data.

You can ask us to transfer certain data to you. You can control the data and transfer the data to a third party yourself. You can send us a email to [info@embolusdetection.com](mailto:info@embolusdetection.com). Enclose a copy of your valid passport, driving licence or other proof of identity.

## **Right to erasure and right to be forgotten: delete your personal data**

Keunen Medical is legally obliged to keep your personal data. But sometimes you can ask us to erase your personal data. In the case of the 'Right to be forgotten' you may ask us to erase your personal data if:

- we no longer need it for its original purpose
- you withdraw your consent for processing it
- Keunen Medical unlawfully processes your personal data

You can ask us to delete certain data. You can send us a email to [info@embolusdetection.com](mailto:info@embolusdetection.com). Enclose a copy of your valid passport, driving licence or other proof of identity.

## **Right to complain**

Should you not be satisfied with the way we have responded to your concerns you have the right to submit a complaint to us. You can send us a email to [info@embolusdetection.com](mailto:info@embolusdetection.com). Enclose a copy of your valid passport, driving licence or other proof of identity.



**Right to access**

Do you only want to check your data? Please use your right to access. You can send us a email to [info@embolusdetection.com](mailto:info@embolusdetection.com) . Enclose a copy of your valid passport, driving licence or other proof of identity.

## How we protect your personal data?

We apply on internal framework of policies and standards across all our business to keep your data safe. These policies and standards are periodically updated to keep them up to date with regulations and market developments. More specifically and in accordance with the law, we take appropriate technical and organisational measures (policies and procedures, IT security etc.) to ensure the confidentiality and integrity of your personal data and the way it's processed.

Data of Keunen Medical are stored on a the **Network-attached storage (NAS)**. The NAS system are contains two [storage drives](#), which greatly reduces the chance of loss of information due to drive failures.

In addition, Keunen Medical employees are subject to confidentiality and may not disclose your personal data unlawfully or unnecessarily.

## What you can do to keep youre data safe?

We do our utmost to protect your data, but there are certain things you can do too:

- Install anti-virus software, anti-spyware software and a firewall. Keep them updated.
- Do not leave equipment unattended.
- Keep your passwords strictly confidential and use strong passwords, i.e. avoid obvious combinations of letters and figures.
- Be alert online and learn how to spot unusual activity, such as a new website address or phishing emails requesting personal information.

## How long we keep youre personal data?

We are only allowed to keep your personal data for as long as it's still necessary for the purpose we initially required it. After this we look for feasible solutions, like archiving it. Also the law obligates us to store your personal data. The retention period that applies depends. Ranging from several months to many years.

## Contact and Questions?

If you want to know more about Keunen Medical's data policies and how we use your personal data, you can send an email. You can send us a email to [info@embolusdetection.com](mailto:info@embolusdetection.com)

