



Our Data Protection Promise

Affidea is committed to respect your rights under data protection laws. Keeping your personal and health data safe is very important to us. Our **Data Privacy Notice for Patients** (“Notice”) contains the essential information about our data processing when providing your medical services. We kindly ask you to take a moment to read the Notice so that you are clear about why and how we process your personal data. In the Notice you can find information on the following:

- (a) the identity and the contact details of the data controller;
- (b) the contact details of the data protection officer;
- (c) the purposes and legal basis for processing;
- (d) the sources of your personal data;
- (e) the recipients of your personal data;
- (f) the period for which your personal data will be stored;
- (g) your rights under data protection laws;
- (h) international data transfers.

Your Data Protection Statement

Mandatory acknowledgement for the provision of medical services to you

I, the undersigned, by signing this statement acknowledge that I have received the Affidea Data Privacy Notice and its Annex providing clarifications about how Affidea will process my personal data for the purpose of performing medical diagnosis and/or providing medical treatment.

Place and date: _____

Print full name of patient: _____

Signature of the patient: _____

If the patient cannot make a statement and/or sign on their own behalf, please provide us with the reason and the identity of the representative:

child under 16 vulnerable adult other: _____

Print full name of the representative: _____

Signature of the representative: _____

Data Privacy Notice for Patients

Affidea is a medical services provider with high ethical standards. "Affidea" ("we" or "us" or "our") refers to Affidea SA, Rue de Romont 24, 1700 Fribourg, Switzerland.

1. Legal reasons for processing your personal data

We are committed to protecting and processing your personal data and we are required to do so by law. Our medical professionals are subject to a professional duty of confidentiality.

It is necessary for us to use your personal and health data so that we can provide you the requested medical service.

Processing of your basic personal data (e.g. name and contact details) is necessary for scheduling your appointment and for the delivery of the medical services you need. The **medical service agreement** constitutes the legal basis for processing your basic personal data.

Your health data covers information related to your health (e.g. information about a requested diagnosis/treatment and our health assessment). Providing you with a **medical diagnosis and/or medical treatment** forms our legal basis for processing your health data.

If you are in an extreme or life-threatening condition while present at one of our clinics, we will use your health data in order to preserve your health and well-being, and on the basis of **protecting your vital interests**.

2. Data we process

During your relationship with Affidea, we obtain your personal data from three sources: (1) from you, (2) from others and (3) from our medical activity.

(1) In order to provide you with your medical service, we ask you to provide us your basic personal data (especially your personal identification data), your payment and insurance data (data necessary in order to pay for our service) and your health data (particularly information about your health condition). If you decide to share previous images and medical reports for us to use, we will store and process these on our systems for the purposes of your medical diagnosis and/or medical treatment. If you voluntarily supply contact information of your next of kin or family, this data will only be used when we are unable to contact you, or in the event of an emergency.

(2) We collect personal data from others in the following instances:

If you are referred to our clinic by a medical provider (referring doctor or hospital) we consult this person about your health condition and/or treatment, if necessary to find the most appropriate medical service for you.

(3) When providing your medical diagnosis and/or medical treatment, we are creating health data about you. As a medical services provider, Affidea is required by law to carefully document the service provided to you.

For further information about the data we process, please see the Annex of this notice or ask one of our receptionists.

3. How long we retain your data for

Affidea retains your personal data for a period necessary to provide medical services and to comply with applicable medical, tax, accounting or other legislative requirements. If our legal obligation to retain your data ends, we will delete your data or anonymise it. Anonymization describes a process on personal data (or a set of personal data) that makes it permanently impossible to identify the person to whom the personal data related to. Affidea will not delete or anonymise your data if an alternative lawful basis for keeping it is identified, for example, Affidea's legitimate interest to defence against claims. If this is the case, we will contact you.

For further information about how long we keep your data, please see the Annex of this notice or ask one of our receptionists.

4. Who we share your data with

During your relationship with Affidea, we share your personal data with three different types of recipients: (1) with providers instructed by us, (2) with providers independent from us and (3) with people you request us to share data with.

(1) Affidea uses service providers (so-called data processors) to assist us in processing the personal information we receive and create (for example medical and financial software and hardware vendors, contracted medical professionals, providers of paper document storage). The data processors act on behalf of Affidea on our written instructions. We only share your data that is absolutely necessary.

(2) We share your personal data with third parties (meaning recipients independent from us) in the following instances:

- a) If we are required by law.
- b) If needed to perform our obligations with a medical professional or insurer you have a contract with.
- c) If the protection of your vital interest so requires, we will share your health data with other medical professionals.

We only share your data that is absolutely necessary.

(3) We will send your health data to your referrer and if a special request is made on the request form, we are sending a copy of the report to the requested doctor. We kindly suggest enquiring about how and why this person would process your personal data first. The processing activities of third party recipients are outside our control and responsibility. If you want us to share your health data with other medical professionals, please consult our receptionists about the available means for such data transmission.

For further information about the recipients of your personal data please see the Annex of this notice or ask one of our receptionists.

5. International data transfers

It might be needed to share your personal data with recipients located outside Europe. Before transferring your data outside Europe, your data is safeguarded as we ensure (1) the recipient country is covered by an adequacy decision of the European Commission and (2) that so-called Binding Corporate Rules or standard EU contracts are used. If we need to transfer your data to a country not covered by an adequacy decision of the European Commission, we will inform you about this transfer in advance.

For further information about the location of your personal data, please see the Annex of this notice or ask one of our receptionists.

6. Keeping your data safe

Keeping your data safe is our priority. Your personal data is stored securely by us, or by our carefully selected service providers. When our service providers process health data on our behalf, we require a high level of protection.

We make sure that very strict security measures are in place to keep your personal data safe against loss and misuse, as well as unauthorized access or transfer.

7. Your rights

Under data protection legislation you have the following rights.

- 7.1. *Right to request access to your personal data.* This means that you are entitled to know that your data is being processed and you are entitled to access your personal data processed by us and to being provided with information about what Affidea does with your personal data.
- 7.2. *Right to request rectification of your personal data.* This means that you are entitled to have your personal data corrected or completed if it is inaccurate or incomplete.
- 7.3. *Right to request erasure of your personal data.* This means that you are entitled to have your personal data deleted in specific circumstances if there is no lawful reason for continuation of processing.
- 7.4. *Right to request from us restriction of processing.* This means that you may request to 'block' the processing of your personal data. Your valid request will mean that we will be allowed to store your personal data, but not to process it further.
- 7.5. *Right to data portability.* It allows you to access and reuse your personal data that you have provided us for your own purposes across different services. You are entitled to receive and transfer an electronic copy of your personal data easily and to ask us to transfer it to another controller.

If you wish to use your rights or wish to have further information about your rights above, please ask one of our receptionists or contact our Data Protection Officer (you can see the contact details below).

8. If you have any questions

If you have any questions or would like more information, please feel free to contact our Data Protection Officer (e-mail: dpo.ch@affidea.ch, postal address: Rue de Romont 24, 1700 Fribourg, Switzerland; telephone number: 0582553393 or ask one of our receptionists for further information. If you are unhappy with the way we process your data, you can make a complaint to the Supervisory Authority [CNIL, 8 Rue de Vivienne – 75083 PARIS cedex 02 – France, tel +33153732222]. However, we would of course hope that you are able to raise any issues with us in the first instance.

Annex to Data Privacy Notice for diagnostic imaging

Below you can find further information about who we share your data with. We only share your data with other recipients if it is absolutely necessary.

| Data recipients acting on behalf of (and instructed by) Affidea | | | |
|---|---------------------------------|--|---|
| Industry | Sector of activity | Sub-Sector of activity | Type of activity |
| Medical | Medical Professionals | Doctors | Provision of medical services |
| | Medical Professionals | Other healthcare professionals | Provision of medical services |
| | Consultant Medical Professional | Radiologist | Provision of a second opinion, if necessary |
| Service Providers | Administration | Call Center | Scheduling appointment by calling our call center |
| | Operation of medical equipment | Maintenance | Maintenance of Medical Equipment |
| Information Technology | Electronic communication | E-mails | Operation and Hosting of E-mail system |
| | Medical Software | Radiology Information System | Patient registration, scheduling, examination data creation and diagnosis creation, billing support, distribution of medical report |
| | | Picture Archiving and Communication System | Storage of diagnostic images |
| | Financial Software Supplier | Accounting | Billing of health costs |
| | Operation | Operation of IT infrastructure | Ensuring availability of data |
| | Support | User Support | Ensuring availability of systems |
| | | System support | Software maintenance |
| Data Storage | Back-up of data | Securing availability of data | |
| Security | Monitoring premises | CCTV operation | Video recording |

| Third party data recipients (acting independently from Affidea) | | | |
|---|---|---------------------------------------|---|
| Industry | Sector of activity | Sub-Sector of activity | Type of activity |
| Health Insurer | Private Health Insurance | Financing | Confirmation of insurance coverage |
| | | Financing | Confirmation of insurance coverage |
| | National Health Insurance | Operation of National Health Database | Storage of NHI financed medical files |
| Financial institution | Bank | Payment | Payment processing by credit or debit card |
| | Private Health Fund | Payment | Reimbursement of health costs |
| Medical | Public Medical Management | National Medical Organization | Management of national quotas, if medical services is publicly financed |
| | Ambulance | - | Delivery of patients to or from our medical centre |
| | Referring Doctor / Medical organization | - | Referral of patients |
| | Clinical Research Organization | Clinical research | Requests and uses clinical exam results, if you are participant of it |
| Public Authorities | Medical Authority, police, etc. | - | Exercise of investigating power |
| Insurance | Service Insurance | - | In case of a claim filed by you concerning our medical service |
| Audit | External Audit Organization | - | examination of quality standards |
| | Certified public accountant | - | examination of books of accounts |
| Communication | Postal services | - | Delivery of letters |
| | Telephone services | - | Operation and Hosting Telephone system |

Below you can also find further information about the type of data we process and about how long do we keep your data for.

| Personal data processed | | | | |
|--------------------------------|---------------------------------|---|---|---|
| Purpose of our data processing | Personal Data Type | Examples of Personal Data | Reasons for Processing | Retention period |
| medical service | Basic Personal Data | Name, NHI Number, Mobile number, Address, email address | Scheduling of appointment, registration, identification of patient, keeping contact with patient | Statutory retention period is at least 10 years. |
| | Financial and Insurance Details | Proof of Insurance Cover, Credit Card data | Financing and payment | Statutory retention period is at least 10 years. |
| | Medical Data | Prescription, Historical Medical Records, Diagnosis | Patient safety, confirmation of correct medical procedure, production of medical diagnosis and planning medical treatment | [Statutory retention period is at least 10 years. |
| | Other personal data | Identity of referring/family doctor | contact other medical professional for further health care data for the best care | Statutory retention period is at least 10 years. |
| | Medical Data | Type and date of your diagnosis and/or medical treatment at Affidea | | |