

	INFORMATION NOTICE PROTECTION OF PERSONAL INFORMATION BY H4D	Ref : QENRG0_82_EN Version : 1.1 Date : 17/04/2020
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**INFORMATION NOTICE
PROTECTION OF PERSONAL INFORMATION BY H4D
addressed to booth users, clients and partner physicians**

In compliance with regulations concerning data protection and in particular the Data Protection Act (French Loi Informatique et Libertés) dated 6th January 1978 and modified and updated on 20th June 2018, as well as the General Regulations for Data Protection N° 2016/679 dated 27th April 2016, H4D undertakes to protect and respect the confidentiality of information about users and clients.

H4D is a company specializing in supply of innovative telemedicine products and services, and provides for their employees, their subscribers, or designated beneficiaries ("Users") of their clients ("Clients") an autonomous health parameter measurement service in their telemedicine booths ("Consult Station"), facilities on the theme of preventive health ("Solutions") and access to medical teleconsultations ("Teleconsultations") carried out by general physicians ("Partner Physicians").

H4D has been authorized to implement digital processing of information collected during use of a telemedicine device, by the National Commission for Data Protection (Decree n°2017-027 dated 16th February 2017).

As described above, H4D makes use of a medical information host approved by the French governing body ASIP Santé ("Approved Host"). This Approved Host acts in the position of second-tier subcontractor.

1 Identity of those responsible for processing information

H4D, with its Head Office located at the address 92, Avenue Kléber, 75016 Paris, France, is responsible for processing personal information processed under the framework of its commercial relations with Clients and contractual relations with remote Partner Physicians.

Clients are responsible for processing personal information processed under the framework of provision of Solutions to Users and for all User personal information.

Since only remote Partner Physicians are authorized to provide teleconsultations, they are responsible for processing personal information processed under the framework of Teleconsultations.

2 Information collection

The User transfers personal information when they:

- Provide their contact details to be recontacted by H4D;
- Make an appointment online and create their user account on one of the platforms (internet or mobile app) to access and use Solutions;
- Use the Consult Station to receive a health assessment;

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- Use the Consult Station for a Teleconsultation;
- Access the website, jemesurveille.com, to consult personal information collected during their visits to the Consult Station, and, if they wish, to download their information.
- Answer questionnaires used to verify Consult Station access criteria or anonymous satisfaction surveys related to use of the Consult Station.

3 Types of information processed

3.1 Information processed as a subcontractor

To allow an appointment to be made, H4D collects and processes the following personal data:

- User's last name and first name;
- User's date of birth;
- User's sex;
- User's postal address;
- User's telephone number;
- Reason for consultation, required only for Teleconsultations when they are addressed to a Partner Physician who is a General Physician. This information is collected indirectly for the requirements of, and under the responsibility of, the Partner Physician. Only personnel subject to H4D's medical confidentiality policy process this information.

During a medical assessment in the Consult Station, personal information is hosted by the Approved Host and includes in particular:

- User's date of birth;
- User's sex;
- Height, weight, BMI, temperature, heart rate, blood oxygen levels, blood pressure, pain assessment and the results of eyesight and hearing tests on the user.

During a Teleconsultation, the following personal medical information is hosted by the Approved Host for the Partner Physician, in their position as entity responsible for processing information, including in particular:

- User's last name and first name via the User's public health insurance card;
- NIR as national health identification number from the User's public health insurance card;
- Height, weight, BMI, temperature, heart rate, blood oxygen levels, blood pressure, pain assessment, results of eyesight and hearing tests, results of stethoscope, dermatological and ear, nose and throat examinations, as well as User electrocardiogram graphs;
- Any previous medical history provided by the User;
- Appointment report from the Partner Physician;
- Letter addressed to the User's personal physician;
- Copy of any medical prescription written by the Partner Physician.

The User can choose whether or not to access their medical parameters in the Consult Station, on the website jemesurveille.com. This access is provided for their own requirements and purposes. Login details are attributed on a random and non-nominative basis, allowing confidentiality of the

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collected parameters to be respected. If the User has lost their login name and password, these are provided again in exchange for indication of their email address. The User can also choose to download the information that is stored on their behalf.

n.b. : The information processed through the use of the internet website www.h4d.com (incidental to the H4D service) is detailed in the "Personal data protection" page on www.h4d.com

3.2 The information processed by those with responsibility for processing

H4D sets up contracts with their Clients and signs conventions with remote Partner Physicians. As part of this, H4D collects and processes certain personal information about them.

These can be names, profession, contact details, qualifications and/or skills and fields of expertise, photographs and recordings as well as relevant financial information.

This data is either provided by Clients and Remote Partner Physicians or obtained from sources available to the public.

H4D processes this personal information for the requirements of execution of the contractual relationship and to respect its legal obligations.

This means that H4D processes this information mainly for purposes relating to management of its contractual relationship, including in particular: invoicing, organization of the relationship and provision of Consult Stations, payment of fees and taxes and monitoring of these payments for the purposes of complying with internal procedures; accountability, any presentation of this information to the public authorities that may be required in light of all applicable legislation and for proper internal evaluation, and to obtain an overview of its activities.

4 End purposes of processing

H4D processes User personal information under the framework of subcontracting for the requirements of their Clients and remote Partner Physicians.

Clients' aims generally include supply of Solutions to Users and also aims relating to monitoring of their appointment schedule and their healthcare pathway. Due to this, Solutions allow the following to take place:

- Give the Partner Physician the information required for them to organize preparations for the User appointment;
- Organize the appointments at Consult Stations for cycles of measurements without Teleconsultation;
- Make it possible for the User to manage their appointments via their personal account;
- Make it possible for the User to consult their personal medical information;
- Send the User text messages and/or email confirmation of appointments and reminders of scheduled appointments;

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Under the framework of their Clients' aims, H4D may need to collect consent from Users for processing of personal medical information. The Users can retract their consent at any times, but this will prevent them accessing Solutions later on.

H4D can use information stored under a pseudonym and collected in order to establish analyses and statistics, in particular to improve the operation of its service by using a non-nominative questionnaire completed by the User as part of steps towards customer satisfaction.

5 Information recipients and no-transfer policy

Personal information in User profiles and personal medical information are not shared by H4D except with the Approved Host for provision of technical services. As part of its role as subcontractor, only personnel subject to medical confidentiality can access Users' personal medical information.

Personal information related to making appointments and follow-up care can be shared with H4D service providers in their position as second-tier subcontractors.

The Partner Physician will have access to information related to the Teleconsultation as part of their position as the entity responsible for processing information. All Partner Physicians are registered with the Council of the Order of Physicians and are obliged to act under medical confidentiality. For the requirements of User reimbursements, H4D can, as subcontractor of Partner Physicians, be required to send relevant information to social institutions and health insurance establishments.

No personal data is transferred by H4D outside the European Economic Area.

6 Rights of those affected

In compliance with current laws, people affected have a right to access, rectify, update, delete, limit processes relating to, mobilize, and oppose use of their personal information. The User can exercise this right by writing to H4D at the address 92, Avenue Kléber, 75016 Paris. The Delegate for Data Protection is Bruno Jeantet, bruno.jeantet@h-4-d.com.

People affected can also submit a claim to the appropriate Inspection Authority for Data Protection in their country of residence. The name and contact details of the appropriate Inspection Authority can be found at the following link:

http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

7 Duration of data conservation

The duration of file storage is 10 years in compliance with the Law dated 4th March 2002 (from the date of the last patient consultation).

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Personal data, other than medical information, are saved for the duration of existence of the Consult Station, namely 6 years.

8 Approved hosting

To date, the Approved Host for medical information is Orange Business Service (address Agence Entreprises IdF 41964 Blois Cedex 09). Orange Business Service is approved by the Ministry of Health as a “host for medical information of a personal nature”.

9 Data security

When H4D is the entity responsible for processing, H4D undertakes to apply and put in place all the technical, administrative and physical means, and any other necessary means, in order to ensure protection, security, integrity and confidentiality of the information with no detrimental effect to all other means required from H4D under the applicable law.

10 Use by a minor

Minors aged 14 years and over can use Solutions. This information notice is given to a person with parental authority and to the minor. The person with parental authority must provide the necessary explanations to the minor.

If the minor wishes their use of Solutions and of the Consult Station to remain confidential in conformity with Articles L. 1111-5 and L. 1111-5-1 of the Public Health Code, they must contact H4D's Delegate for Data Protection, whose contact details are provided above, before using Solutions.



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Version	Date de Modification	Auteur	Motif
1.0	XXXXX	Département qualité	Création (traduction de QENRG0_82)
1.1	17/04/2020	G.GERMAIX	Mise à jour pour tenir compte de la séparation de la politique de protection des données personnelles des patients et médecins (solutions H4D) de la politique de protection des données personnelles des internautes sur le site www.h4d.com (non essentielle au service H4D) cf QENRG0_82.B