



# delmont imaging



## Privacy policy and data security

The privacy and information security policy describes how Delmont imaging collects, uses and protects your personal data.

We, Delmont imaging, have drafted this policy with the aim of identifying the conduct, values and principles that should guide our work and our decisions within our company, with our partners and in our community in order to fulfil our mission:

***To improve the care and management of all patients, whatever their age and whatever their future, by providing the profession with innovative, effective and less traumatic solutions.***

We are committed to respecting these principles in everything we do, so that our activities reflect positively on our employees and our company.

## Content

Our confidentiality commitments.....	3
Personal data collected.....	4
Personal data received from third parties.....	5
Use of personal data.....	5
Retention of personal data.....	6
Protection of your personal data.....	6
Protection of patients' personal data.....	6
Data protection impact assessment.....	7
Compliance with user instructions.....	7
Sharing and transferring your personal data.....	7
Cookies and other technologies.....	8
Response to personal data breaches.....	8
Your rights.....	8
Information and entry into force.....	9

## Our confidentiality commitments

### ➤ Preserving people's confidentiality

We take a cross-functional approach to privacy governance. This means that our approach covers all areas of our business and includes our customers' data, our users' data and our employees' data, so that it is as secure as possible with the principle of confidentiality by default.

### ➤ Collect only the data we need

We only collect the minimum amount of data necessary to provide our products and services to our users and we only keep it for as long as is necessary to achieve the purposes for which it was collected and to meet our regulatory obligations.

### ➤ Empowering our partners

We have appointed a Data Protection Officer (DPO) responsible for privacy and legal compliance, who reports directly to the Director of Delmont imaging. All our employees who may have access to personal data, or our engineers developing devices that may process such data, work closely with our DPO. Our aim is to provide services and design products that protect the privacy of our users and patients.

# Information security management system

We are as committed to confidentiality and information security as we are to women's health. We believe that any successful business strategy must be established with a long-term perspective, particularly in medical devices, and as such must ensure the confidentiality and security of information.

To achieve this strategy, we are establishing an information security management system in accordance with the ISO 27000 series of international standards, with clearly defined, monitored, and updated objectives.

We expect our employees to commit proactively to this system and, if necessary, to question commonly established economic paradigms. This approach must ensure the longevity of the company as much as the security of its information, and the sole pursuit of immediate profit must under no circumstances call it into question.

## Personal data collected

At Delmont imaging, we believe that you can benefit from our medical devices and services in a confidential manner. Therefore, we strive to collect only the personal data we need. The personal data that Delmont imaging collects depends on how you interact with us.

All such processing is identified and assessed in our personal data processing register. Descriptions of how Delmont imaging handles personal data for individual products are available on request by our users.

When you interact with Delmont imaging to request information, conduct a training or demonstration, acquire our products and services, or use our devices, we may collect personal information such as:

- Your contact details: your surname, first name, job title, company, physical address, telephone number and email address.
- Information about your devices. Data enabling the device to be identified, such as the device serial number.
- Your payment information. Data concerning your billing address and method of payment, such as bank details, credit and debit data, or other banking information,
- Information about our transactions and contracts. Data concerning purchases of products and services from Delmont imaging.
- Usage data. Data relating to your activity on our products and your use of them, such as returns, requests for improvements, fault data, performance data and other diagnostic data.
- Official identification data. In some jurisdictions, we may ask you for official identification, but only in certain cases, if required by law.
- Our devices may, under the responsibility of your doctor or his or her health establishment, collect health data about you. This data is never transmitted to us, unless required by law, but we ensure its protection and confidentiality within our devices.
- Other information you provide to us. Data such as the content of your communications with Delmont imaging, including customer support interactions and social media contacts.

We do not collect, store or process so-called sensitive data (racial or ethnic origins, political, philosophical or religious opinions or trade union membership of individuals, or data relating to their health or sex life), and we do not automatically process the data in such a way as to make any deduction or estimate, even a false one, based on this type of information.

You are not obliged to provide us with the personal data we request. However, if you choose not to provide it, we may not always be able to provide you with our products and services, or even answer your questions.

## Personal data received from third parties

Delmont imaging may receive personal data about you from other individuals, from companies or third parties acting under your direction, from partners who work with us to provide our products and services and help us to ensure security and for other legal reasons.

- Under your direction: You may ask other individuals or third parties to share data with Delmont imaging. For example, you may ask your healthcare facility, sales agent or distributor to share your contact information in order to complete a transaction or provide technical support.
- Partners of Delmont imaging: We may also check the information you provide, such as your bank details or your registration with certain competent authorities, when you wish to purchase medical devices.
- For vigilance purposes: We may receive sensitive personal data relating to the health of patients. When we acquire this type of data, we check their anonymisation or proceed to anonymise them unless traceability is required by applicable law. When we use this type of data for vigilance purposes, we do not attempt to re-identify individuals who may be included.

## Use of personal data

We only use your personal data where it is legally appropriate to do so. We use personal data to provide our products and services, to process your transactions, to communicate with you and to comply with the law.

Depending on the circumstances, Delmont imaging relies on the fact that data processing is necessary to perform a contract with you, to protect your vital interests or those of third parties, or to comply with the law:

- Process your transactions: To process your transactions, Delmont imaging must collect data such as your name, your purchase and your payment information.
- To fulfil contracts and provide our services: We collect necessary personal data, which may include personal data, for internal purposes such as audits or troubleshooting.
- To communicate with you: To answer your questions, contact you about your transactions or your account, market our products and services, provide other relevant information, or request information as part of our post-market surveillance. Finally, we may use your personal data to send important notifications, such as safety information, product recalls or changes to our terms of use and policies. As this information is important for everyone's safety, you cannot object to receiving these important notifications.
- Comply with the law: To comply with applicable law, for example to meet tax obligations, material vigilance obligations, medical device traceability obligations, transparency laws, healthcare industry codes, or to comply with a lawful government request.
- We may also use personal data for other purposes, but this is necessarily done with your prior and systematic consent for each required purpose.

## Retention of personal data

We retain personal data in accordance with our data retention schedule included in our data processing register, only for as long as is necessary for the purposes for which it was collected, in particular as described in this commitment or in our product-specific privacy notices.

In estimating these periods, we first carefully consider whether there is a need to retain the personal data collected and, if we establish such a need, we endeavour to retain it only for the shortest period possible according to the following criteria:

- Contractual necessity: for the duration of the contract plus an additional period limited to the traceability obligation that is necessary to comply with the law or that represents the limitation period for legal claims that may arise from the contractual relationship.
- Obligation of traceability: compulsory period for keeping information within the regulatory framework for medical devices, which may vary depending on the area where you are located and the devices concerned,
- Consent: For the period necessary to fulfil the underlying agreement with you, subject to your right, under certain conditions, to be able to delete certain personal data (see Rights of data subjects below).

## Protection of your personal data

At Delmont imaging, we believe that respect for confidentiality is based on an excellent security system. We use administrative, physical, and technical security measures to protect your personal data, taking into account the nature and processing of personal data, as well as threats based on a rigorous risk analysis.

These technical and organisational measures are designed to protect the security, confidentiality, and integrity of personal data, including protection against unauthorised or unlawful processing and against accidental or unlawful destruction, loss, alteration, damage, unauthorised disclosure of or access to personal data.

In particular, we treat all personal data as confidential information and ensure that all our employees, agents and subcontractors involved in the processing of personal data are informed of the confidential nature of such data.

We ensure that access to personal data is restricted to those who perform the services in accordance with the user agreements, and that all our employees, agents and sub-contractors are committed to confidentiality (or are subject to an appropriate legal duty of confidentiality) and are aware of their responsibilities. We ensure that all our employees are aware of their obligations and responsibilities to protect your data and receive training on their responsibilities specific to their role.

Delmont imaging only engages with carefully selected subcontractors. Consequently, we impose data protection conditions on each subcontractor we work with in order to meet the same commitments we make.

We are constantly seeking to improve these security measures in order to guarantee the security of your personal data through regular testing, evaluation and control processes.

As a partner and subcontractor, we are also committed to providing all necessary assistance to our users to ensure compliance with their respective security and confidentiality protection obligations.

## Protection of patients' personal data

At Delmont imaging, we understand the importance of patients' personal data, which is sensitive health data. That is why we have put in place additional processes and safeguards to protect the security of our users' personal patient data.

All medical devices are designed by Delmont imaging so that our users can ensure that any personal data processing activities they carry out comply with the principles of *privacy by design* and *privacy by default*.

We actively collaborate with healthcare institutions to ensure the total security of patient data systems in which our devices may be used. These establishments are required, in the same way as Delmont imaging, to comply with the applicable regulations in force in order to ensure the protection of patients' personal data.

## Data protection impact assessment

As part of our product and service development, we carry out Data Protection Impact Assessments (DPIA) as soon as they are necessary and in accordance with the applicable regulations.

These analyses are carried out using a risk-based approach with levels leading to review periods ranging from 1 to 2 years. All identified safeguards are put in place to minimise risk. They also take into account how laws affect privacy and assess any risks associated with privacy in the relevant jurisdictions in which we operate.

As a medical device supplier and data processor, we are committed to assisting our users in conducting data protection impact assessments, including data transfer impact assessments, and/or prior consultations that may be required.

## Compliance with user instructions

As a data processor, we are committed to processing personal data only in accordance with your instructions. We have updated our internal policies to ensure that all Delmont imaging employees who have access to personal data shall process that data in accordance with your documented instructions.

## Sharing and transferring your personal data

We may share personal data with companies affiliated with Delmont imaging, service providers acting on our behalf or our partners:

- Service providers: Delmont imaging may use third parties to act as service providers and perform certain tasks on our behalf, such as our sales agents, in connection with our transactions and the performance of our contracts. Delmont imaging's service providers are required to process personal data in accordance with this Privacy Policy and our instructions. They may not use the personal data we share for their own purposes and must delete or return the personal data after satisfying our request.
- Partners: Delmont imaging may work with third parties to provide services or other solutions. For example, in connection with deliveries, installations or financial solutions. We require our partners to protect your personal data to the same standards as we do.
- Others. We may share personal data with third parties at your direction or with your consent. We may also disclose information about you if we believe that for national health, law enforcement or other public interest purposes disclosure is necessary or appropriate. We may also disclose information about you, if legally justified, if we believe that disclosure is reasonably necessary to enforce compliance with our terms and conditions of use or to protect our business or our users, or in the event of a reorganisation, merger or sale.

Where such data transfers involve external recipients, we ask them to check that they have appropriate safeguards in place to protect personal information and ensure that the rights and requests of data subjects are respected.



## Cookies and other technologies

Our website uses "cookies" and other technologies such as web beacons. These technologies enable us to better understand user behaviour, particularly for security purposes, and tell us which parts of our websites are visited most often. They facilitate and measure the effectiveness of Internet advertisements and searches. Their use is described in the terms of use of our website or other services.

## Response to personal data breaches

We have developed and continue to develop protection and security measures to identify, assess and report personal data breaches. When we are faced with a data security incident that could have an impact on your personal data, our specialist team investigates to learn what happened and determines the measures to be taken in response. If we do find an impact on your data, we work immediately to close it and identify steps for remediation.

In the event that a confidentiality problem may have a significant negative impact on a user or a third party, the persons concerned are informed as well as the competent authorities without undue delay after the discovery of such a data breach. We take care to comply with all applicable laws requiring notification of data security incidents. We may make such notifications by telephone or e-mail.

We also provide assistance, which may include information on measures to be taken to reduce the risk of harm, as well as cooperation with any internal or external investigations carried out by third parties, including the judicial authorities.

## Your rights

You may, at any time, exercise your right of access, rectification, deletion, limitation, opposition and portability concerning the information you have provided, by contacting Delmont imaging. We have put in place appropriate procedures to make it as easy as possible for you to exercise these rights.

We would like to remind you that you can lodge a complaint with the regulatory body applicable in your country at any time. For the European Union, the contact details for each country are given on the *European Data Protection Board* (edpb) website [here](#). For any other country, please contact us if you are not familiar with it.

However, the exercise of all these rights may be subject to compliance with the law, in particular with regard to us as a manufacturer of medical devices. Similarly, we must remind you that we may be legally obliged to disclose data concerning you when we receive valid legal proceedings from a competent law enforcement authority.

If you have any questions about our privacy practices, or about the legal basis for our processing, including in cases where a distributor, agent, or other third party service is acting on our behalf, or if you wish to contact our Data Protection Officer or submit a complaint, you can contact us at [dpo@delmont-imaging.com](mailto:dpo@delmont-imaging.com) regardless of your country or region.

We take your questions about confidentiality very seriously. A dedicated team will review your request to best address your question or concern. In most cases, all substantive communications will receive a response within seven days. Occasionally, we may need additional information or time to respond.

If your complaint indicates that the handling of privacy issues could be improved, we will take the necessary steps to make such improvements as soon as possible. If you are not satisfied with our response, you may refer your complaint to the applicable regulatory body in your country. If you so request, we will endeavour to provide you with information on possible remedies applicable to your situation.



## Information and entry into force

This policy is communicated individually to each employee when they are hired and annually during their personal interview. Any questions can be addressed to [policies@delmont-imaging.com](mailto:policies@delmont-imaging.com).

Please take the time to familiarise yourself with this policy. It is a resource for understanding our principles and values, so that you know what is expected of you as a representative of the company, and also our partners, so that they know what they can expect from us.

If you find yourself in a situation that you believe may violate this policy, or if you have any questions or concerns related to this policy, please speak promptly to your manager or the Quality Manager. When in doubt, the company wants you to come forward and will not tolerate retaliation against anyone for coming forward. It is the responsibility of all employees to help ensure compliance with this policy.



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