

OUR DATA PROTECTION COMMITMENT

Affidea undertakes to respect your rights in accordance with Swiss federal data protection law. We place the highest importance on protecting your personal data and your health data.

Our **Patient information notice on data confidentiality** ("notice") contains essential information relating to how we handle the data that we have to collect, process and share under certain conditions so that we can act in your best interest to offer the medical services required for your treatment and deliver these services correctly.

In the notice, you will specifically find the following information:

- The identity and details for the data controller;
- The details for the data protection supervisor;
- The potential purposes for which your data will be processed;
- The sources and recipients of your personal data;
- How long your personal data will be kept;
- Your rights under data protection laws;
- How data is transferred internationally.

Ask reception for this additional information sheet ("Patient information on data protection") and take the time to read it.

YOUR DATA PROTECTION DECLARATION

INFORMATION RELATING TO PROCESSING IN CONNECTION WITH THE EXECUTION OF MEDICAL SERVICES (see clause 1.1 of the notice)

The present notice is given to you prior to the performance of our medical service. You understand that the performance of this service involves the processing of medical data concerning you, and you understand that, in order to offer you the best possible medical treatment, we may have to grant access to your data to doctors, respectively transfer them to third parties in line with our legal obligations (insurances) or third parties involved in your medical treatment (such as other health professionals). The performance of the service after you have been given the opportunity to read the present notice, without any formal objection on your part, constitutes acceptance of the treatment described in the present notice.

Unless you explicitly object, you agree that administrative requests (e.g. rescheduling of appointments, ... EXCEPT sending of reports and sensitive data) may be made by unencrypted electronic exchange (@hin address to recipient's address @bluewin.ch, @gmail.com etc.).

Location and date: _____

Full name of the patient: _____

Signature of the patient: _____

If the patient cannot make this declaration and/or sign their own name, please tell us why and state the identity of the representative:

child under the age of 16 vulnerable adult other:

Surname and first name of the representative in block capitals: _____

Signature of the representative: _____

Additional authorisation(s) - optional (see clause 1.3. of the notice)

I understand that by checking the boxes below, I am freely authorising Affidea to perform further processing of my personal data (section 1.3 of the notice provides further details). I also understand that if I do not give my consent, this will have no impact on the medical services that will be provided to me. Furthermore, I understand that I can withdraw my consent at any time.

I consent to be informed of clinical studies I could potentially and voluntarily participate in. Yes, I consent

No, I do not consent

I consent to my personal information, including my health data, to be anonymised so that Yes, I consent

Affidea can use and share them for research purposes. They include personal information both as collected by Affidea in the past and as collected by Affidea in the future if I make use of No, I do not consent

Affidea's services.

Signature of the patient: _____

Patient information notice on data confidentiality

Affidea is a medical service provider with high ethical and deontological standards. "Affidea" ("us", "we" or "our") refers to Affidea SA (headquarters: Rue du Château-d'En-Bas 11, 1630 Bulle, Switzerland) and its joint data controller(s), which is **Affidea BV** (headquarters: Vijzelstraat 68 1017HL Amsterdam, Netherlands). Your point of contact is your Data Protection Officer in Switzerland. Their details are provided in section 9.

1. Purposes for processing your personal data

We undertake to protect your personal data and process it in accordance with the law and any regulations which apply to us. Our healthcare professionals are bound by a professional duty of confidentiality.

1.1 Executing our medical services.

The processing of your basic personal data (for example, your name and address) is necessary to arrange an appointment and provide the medical service that you require.

The health data covers the information relating to your health (for example, information relating a diagnosis/treatment requested or our health assessment). This must be collected to ensure we can provide our medical service correctly.

If, when attending one of our clinics, your health is in a critical condition or your life is at risk, we will use your health data to preserve your health and well-being, as part of protecting your vital interests.

Affidea provides you with secure, practical access to the images thanks to its online interface known as the Patient Portal. The diagnostic images are made available on the Patient Portal.

To use the Patient Portal, you must provide us with a valid e-mail address. The e-mail address will be registered by our colleagues at reception and your access to the system will be set up. To activate this, you will simply need to use the password that we have provided to you.

1.2 Improving our services.

At Affidea, we are always trying to find the best ways to deliver our services. The purposes described below are predominantly for the benefit of Affidea and do not involve any potential detrimental effects for you.

A) Patient survey

We believe that feedback about your experience as a patient is crucial for understanding how to best serve our patients. You are therefore invited to take part in our satisfaction survey. Thank you in advance for your contribution. Participation is optional, and will have no impact on the service that we provide to you. If you prefer, we will refrain from contacting you.

B) Statistical analysis of aggregated data

We intend to analyse some of your personal data in an aggregated format, so that we can draw statistical information from it. This is vital for our sales and marketing teams, allowing them to find out which services are most sought after in specific regions, for example. If you prefer, we will exclude your data from our analysis.

C) Quality assurance

We believe that it is crucial to learn lessons from any unexpected events that may occur in our clinics. We record and analyse near-misses (accidents and incidents that were avoided) and events liable to cause harm of any kind whatsoever, so that we can ensure health and safety are protected. We limit this handling of patient data to what is strictly necessary and generally do not use directly identifiable personal data for this purpose.

We do the above for our overriding interest of understanding how to improve our service and its quality. See clause 7.6. about your right to object.

1.3 You may consent to the following processing of data by Affidea, if you wish.

By checking the corresponding box in the "your data protection declaration", you consent to us processing your data in the following manner, it being expressly stated that you are free to refuse said processing or to withdraw your consent at any time, without this refusal having any effect on the execution of our medical service

A) Information on opportunities to participate in clinical trials

Affidea is committed to healthcare and the advancement of medical science. We have trusted partners who help pharmaceutical companies or medical device manufacturers conduct clinical studies in strict compliance with applicable laws. If you are interested in participating in such clinical studies, we will be happy to inform you about those that may be suitable for you (based on the health data we hold about you). We may then contact you via the various communication channels available. Your consent does not mean that you authorize us to disclose your data to a third party, nor to use it for a specific clinical study - such authorizations require separate informed consent from you if you have expressed an interest following our initial information about such an opportunity.

B) Anonymizing a copy of your data

We are committed to constantly improving medical science and to contributing to research and development efforts, whether conducted by Affidea and/or third parties (including, but not limited to, hospitals, universities and health insurers). Research and development refers to the work of innovating, introducing and improving products, procedures and the delivery of healthcare at a reasonable cost. It includes a series of investigative activities to improve existing products and procedures, or to lead to the development of new ones.

We ask for your support by asking you to consent to the anonymization of a copy of your personal data for the retention period determined by law (see section 3.). The data set subject to anonymization includes information relating to your health that we have collected or collect in the course of providing medical services. This data set covers both the personal data we have collected in the past and the personal data we will collect in the future if you use our medical services. In accordance with point 7.1, you have the right to request access to your personal data.

Anonymization of personal data is a process applied to personal data (or a set of personal data) so that anyone using the data cannot identify the patient to whom the data originally related. In this way, you retain your anonymity when your anonymized data is used.

We may wish to use your anonymized data ourselves for research and development, training, statistical and commercial purposes, or to share it with third parties, for or without consideration for us. We carefully select our partners and the method of anonymization in order to minimize the risks associated with the use of your anonymized data.

2. The data that we process

Throughout the course of your relations with Affidea, we obtain personal data about you from three sources: (1) from you, (2) from other people and (3) as a result of medical procedures.

(1) To enable us to provide you with a medical service, we ask you to provide us with basic personal data (your personal identification data), information relating to payment and to insurance (data required for payment for the services) and health data (more specifically, information relating to your state of health). If you decide to provide us with old images and medical reports for us to use, we will process them and save them in our systems so they can be used for diagnosis and/or your medical treatment. If you voluntarily provide us with the details of your close relatives or members of your family, this information will only be used in the event that we are unable to contact you, or in an emergency.

(2) We gather personal data from other people in the following circumstances:

a) If you are sent to our clinic by a healthcare provider (referral from a doctor or hospital), we will consult this person in relation to your health condition and/or your treatment, if needed to identify the medical service best suited to your health condition.

b) If the medical service that we provide you with is paid for through medical insurance (public or private), we will have to gather information on the coverage provided by the insurance company so that we can provide you with the medical service.

c) If the availability of your historical medical record is necessary for the service you have requested from us, we need to gather information from other entities that may hold part of your medical record history.

(3) When providing medical services to you, we create health data about you. As a medical services provider, Affidea is required by law to carefully document these services.

For any further information as concerns the processing of data, please refer to the appendix to this notice or speak to one of our duly trained receptionists.

3. How long do we keep your data?

Affidea keeps your personal data for as long as is needed to execute the medical services and in accordance with medical, fiscal, and accounting requirements and with any other legal requirement. Once our legal obligation to retain your data has expired, we will then delete your data or anonymise it. Anonymisation refers to a way of processing personal data (or a set of data) which consists of rendering it definitively impossible to identify the person to which the personal data refers. Affidea will not delete or anonymise your data if a legally justifiable alternative which permits its retention is identified, such as, for example, if it is in Affidea's legitimate interest to defend itself against claims being made. If this is the case, we will contact you.

For any further information relating to the duration for which your data is kept, please refer to the appendix to this notice, or ask one of our duly trained receptionists.

4. Who do we share your data with?

During your relationship with Affidea, we may share your personal data with 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 your data with.

(1) We use service providers (called "processors") to help us process the personal information we receive and create (e.g. medical and financial software publishers and contracted healthcare professionals). Data processors act on behalf of Affidea on the basis of our written instructions. We only share your data to the extent that it is absolutely necessary.

(2) We share your personal data with third parties (i.e. external independent recipients other than the abovementioned service providers) under the following circumstances:

a. If we are required to do so by law.

- b. If the availability of your historical medical records may facilitate the medical diagnosis and/or medical treatment you have requested. For this reason, we may share your relevant historical medical records with one or more other data controllers as part of your treatment (other healthcare professionals).
- c. If we need to fulfil our obligations to a healthcare professional or an insurance company with whom you have taken out a contract. (This data is passed on to your health, accident or disability insurance company for the purpose of billing you for benefits provided. The type of data transmitted depends on legal requirements).
- d. If necessary to protect your vital interests, we will share your health data with other healthcare professionals.

We will only share your data if this is absolutely necessary.

- (3)** We will send your data to other persons with whom you ask us to share your data. The processing activities of these third-party recipients are beyond our control and we cannot be held liable in any way whatsoever if the sharing of your data with them is done at your request, and therefore with your express consent. We therefore recommend that you first ask the third party how it will handle your personal data.

For any further information as concerns the recipients of your personal data, please refer to the appendix to this notice or speak to one of our duly trained receptionists.

5. International transfers of data

It may be necessary to share your personal data with recipients outside of Switzerland and the European Economic Area (EEA). Some countries offer a level of protection that is deemed by Switzerland to be adequate. Before transferring your data outside of Switzerland or the EEA (or outside of a country which is deemed to offer an adequate level of data protection), your data will be de-identified or safeguarded, generally by using standard contractual clauses approved by the Federal Data Protection and Information Commissioner (FDPIC) or the European Commission. The appendix to this notice contains information on the actual transfer of data and the measures that we use, if data is transferred in an identifiable format. You can find more information on transborder data flows here: <https://www.edoeb.admin.ch/en/data-protection> and on the standard contractual clause here: Standard Contractual Clauses (SCC) | European Commission (europa.eu). You can find more information on countries with adequacy here:

<https://www.edoeb.admin.ch/en/cross-border-transfer-of-personal-data>

and here: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en.

6. Protection of your data

Protecting your data is our priority. Your personal information is stored securely on our internal servers and at Swisscom's Data Center in Lausanne Savoie. When our service providers process health data on our behalf, we demand a high level of protection stipulated also in a written agreement with them. We make sure that very strict protection measures are in place to keep your personal data safe against loss and misuse, as well as unauthorized access or transfer.

7. Your rights

In accordance with data protection legislation, you have the following rights:

- 7.1 *The right to request access to the personal data* (art. 25 DPA and art. 15 GDPR). This means that you are entitled to know that your data is processed by Affidea, and to be informed about what Affidea does with your personal data.
- 7.2 *The right to request the rectification of your personal data* (art. 32 DPA and art. 16 GDPR). This means that you have the right to request that incorrect data is rectified and to request that incomplete data is completed.
- 7.3 *The right to request the deletion of your personal data* (art. 32 DPA and art. 17 GDPR). This means that you have the right to have your personal data deleted under certain conditions, particularly if there are no legal grounds for continuation of the processing of data.
- 7.4 *The right to data portability* (art. 28 DPA and art. 20 GDPR). This allows you to have access to the personal data that you have provided to us and to reuse this for your own purposes across different services. You have the right to receive and transfer an electronic copy of your personal data easily and to ask us to transfer this data to another data controller.
- 7.5 *The right to object to the processing of your personal data* (art. 32 DPA and art. 21 GDPR). You have the right to object at any time to the processing that you have consented to, it being specified that the withdrawal of your consent is only valid for future processing actions, and not for those already undertaken.
- 7.6 *The right to limit the processing of your personal data* (art. 32 DPA and art. 18 GDPR). This means you have the right to restrict processing under certain conditions.

If you wish to avail yourself of your rights or if you wish to have further information on the subject of your rights listed above, please speak to one of our duly trained receptionists or contact our data protection supervisor (the details for whom are given in clause 9 below).

8. Automated individual decision-making, profiling

Affidea does not process your personal data for the purpose of automated individual decision-making. We only engage in profiling (i.e. automated processing involving the use of personal data to assess certain personal aspects of an individual) in the following circumstances:

- (i) If the reading of a diagnostic image by a radiologist is assisted by an algorithm, your state of health will always be diagnosed with the participation of a radiologist and no medical diagnosis will be made solely on the basis of the automated processing of diagnostic images.

9 If you have any questions

If you have any questions or require further information, please do not hesitate to contact our Data Protection Officer (e-mail: dpo.ch@affidea.ch, postal address: Rue du Château-d'En-Bas 11, 1630 Bulle) or ask one of our receptionists for further information. If you believe that we are not processing your personal data in accordance with the applicable laws, you have the right to lodge a complaint with the Swiss Federal Data Protection and Information Commissioner (FDPIC), who is the competent supervisory authority. In addition, you may also bring a civil action for violation of personality pursuant to article 28a of the Civil Code and article 32, paragraph 2 of the Federal Data Protection Act (DPA). However, we hope that you will be able to let us know about your problems in the first instance.

Appendix to the information notice on data confidentiality for diagnostic imaging

You will find below the information relating to the entities with whom we share your data in accordance with the terms and conditions provided for by this information notice. We will only share your data with other recipients when this is absolutely necessary.

Recipients of data acting on behalf of (and appointed by) Affidea				
Industry	Sector of activity	Sub-sector of activity	Type of activity	Identity/Location of the recipient
Medical	Doctors and Healthcare professionals	Doctors	Medical services provider	Several individuals or entities under contract in Switzerland
	Healthcare professional	Other healthcare professionals	Medical services provider	Several individuals or entities under contract in Switzerland
	Consultant healthcare professional	Radiologist	Service providing a second opinion, if needed	Subsidiaries of the Groupe Affidea BV in or outside of the European Union, when necessary (and with the use of standard contractual clauses, if needed)
Service providers	Operation of medical equipment	Maintenance	Maintenance of medical equipment	Siemens Healthcare AG, Philips AG, Nova-Logic SA, GE Healthcare Suisse, Carestream Health Suisse SA, Raymed Imaging AG, Switzerland
	Software IA	Support for Artificial Intelligence	Diagnostic support for Artificial Intelligence	Morphobox, b-ray Z, Incepto, Perspectum
	Monitoring of doses	Operation of the DoseWatch solution	Collection and analysis of patient radiation doses and iodine exposure	General Electric Medical Systems SCS in France
Information technologies	Electronic communication	E-mails	Operation and hosting of the message system	Affidea Group Kft. in Hungary
	Digital workplace	Microsoft Office 365 suite	Hosting and operation of the Office 365 suite	Microsoft SoftwareONE Hungary Kft. in Hungary
	Medical software	Radiology information system	Patient registration, appointment calendar, creation of examination and diagnostic data, invoicing, distribution of the medical report	Medavis GmbH in Germany, VitoData AG in Switzerland, MEDSPAIO in Switzerland, France, Morocco and Bolivia
		Communication and image archiving system	Storage of diagnostic images	Biotronics, SECTRA in Switzerland
	Financial management software supplier	Accounting	Invoicing of healthcare costs	VitoData AG in Switzerland
	Operation	Implementation of information technology infrastructures	Ensuring the availability of data	S&T Consulting Hungary Kft. in Hungary, MagiCom Kft. in Hungary, 4iG Nyrt. in Hungary, Microsoft Invitech Megoldások Zrt. in Hungary
	Assistance	User assistance	Ensuring system availability	Affidea Group Kft. in Hungary
		Running of the system	System maintenance	Affidea Group Kft. in Hungary
	Storage and backup of data	Backup management and storage device	Backing up the availability of data	Symport Holding Informatikai Zrt in Hungary
		Data formatting	Data processing for sending to the CD burner	Orthanc, Switzerland
Information security	Support for the security operations centre	Support for resolving security issues	Dognaedis, Unipessoal Lda. in Portugal	

		Monitoring security issues and events	Security events and information management	NOREG Ltd. in Hungary
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Recipients of data (acting independently of Affidea)				
Industry	Sector of activity	Sub-sector of activity	Type of activity	Identity/Location of the recipient
Health insurance	Private health insurance	Finance	Confirmation of health coverage and social security provision	Provider of insurance services offering you coverage in Switzerland
	National health insurance scheme	Finance		The Swiss Federal Law on Health Insurance ("KVG") in Switzerland
	Swiss Compensation Office ("SCO")	Finance		Swiss Compensation Office ("SCO") in Switzerland
	Swiss National Accident Insurance Fund ("SUVA")	Finance	Mandatory insurance cover for workplace accidents and illnesses	Swiss National Accident Insurance Fund ("SUVA") in Switzerland
	Swiss Federal Office of Public Health ("FOPH")	Activities of the national health data system	Storage of medical files financed by the national institute for medical and biomedical research	Swiss Federal Office of Public Health ("FOPH") in Switzerland
Financial institution	Bank	Payment	Processing of debit or credit card payments	UBS in Switzerland
	Ambulance	-	Transport of patients to or from our medical centre	The ambulance services supplier, in Switzerland
	Prescribing physician/medical centre	-	Patient orientation	Your referring doctor in Switzerland or abroad
	Medical firm	Custom joint replacement systems	Fabrication of prostheses and orthopaedic devices	Zimmer Schweiz GmbH in Switzerland, Zimmer Biomet in the United States Simbiosbox
	Clinical research centre	Clinical research	Requests for and use of the results of clinical examinations, if you are taking part in a clinical trial	Cancer screening foundations and leagues in Switzerland
Public authorities	Medical authority, police, etc.	-	Exercise of powers of investigation	Switzerland
Insurance	Provision of insurance services	-	In the event of a dispute relating to our medical services	Willis Towers Watson Public Limited Company in the European Union, Colonnade Insurance S.A. Branch Office in Hungary
Audit	External auditing firm	-	Verification of quality standards	Ernst & Young in Switzerland
	External auditing firm	-	Provider of ISO certification	DNV Business Assurance in Hungary
	Chartered accountant	-	Verification of the accounts	Ernst & Young in Switzerland
Communication	Postal services	-	Courier services	La Poste Suisse SA, Promed Laboratoire Médical SA in Switzerland
	Telephone services	-	Operation and hosting of the telephone system, Sending of SMS	Swisscom, Apt Vision, Telecom Services SA in Switzerland

You will find below information relating to the type of data that we process and the retention periods.

Processed personal data				
Purposes of data processing	Type of personal data	Examples of personal data	Reasons for processing	Retention period
Medical service	Basic personal details	Name, social insurance number, mobile phone number, address, e-mail address	Making appointments, registration, patient identification, maintaining contact with the patient	Retention period of 20 years.
	Information relating to the insurance and bank details	Certification of insurance cover, bank card details	Finance and payment	
	Medical data	Prescription, medical history, diagnostics, type and date of your diagnosis and/or your medical treatment at Affidea	Patient safety, confirmation of a suitable medical procedure, establishment of the medical diagnosis and medical treatment planning	
	Other personal data	Identity of the attending or referring physician	Contact with other healthcare professionals for further information on the health data in order to provide the best possible care	
Anonymisation of your data to improve the medical services	Anonymised medical data	Diagnostics	Research and development	None of your identifiable personal data is retained. The patient may consent to an extension of the retention period for their file for research purposes.