

PRIVACY POLICY (PROTECTION OF PERSONAL DATA)

Update :

1. SCOPE OF APPLICATION

This confidentiality policy applies to all users of the Cortex solution, marketed by MN Santé Holding and Medtronic. This solution offers a kiosk to manage access to applications made available to users by the Healthcare Establishment.

Within the framework of the supply of the Cortex solution to your Healthcare Establishment, MN Santé and Medtronic act as subcontractors and your Healthcare Establishment as data controller. The personal data used for the initial registration on the Cortex website and the management of your user account will be carried out according to the instructions of your Healthcare Establishment and according to the terms of access to the solution if it is a Medtronic or MN Santé client establishment.

Personal and health data processed by your healthcare establishment on applications registered in the Application Kiosk are not processed or accessed by Cortex and are entirely the responsibility of your healthcare establishment.

For the management and security of the Cortex site, MN Santé will collect certain personal information and will act as data controller for this part.

This policy describes how your data is collected and used, with whom it is shared, what rights you have regarding your information and who to contact to exercise your rights.

2. GLOSSARY

- **"Cookie"**: a term to be taken in its broadest sense and covers all traces deposited and/or read, for example, when a website or mobile application is consulted, or when a chatbot is activated or prior to activation. For convenience, we use the term "Cookies", which covers all technologies that read or write data to the user's terminal. A cookie or tracker is placed by your Internet browser (e.g. Internet Explorer, Firefox, Safari or Google Chrome, etc.) on a dedicated space on your terminal's hard disk, by the server of the Website or mobile application that you visit or consult. The information stored there may be sent back to our servers.
- **"Personal Data"**: Refers to any information relating to an identified or identifiable natural person.
- **"Recipient"**: Refers to the department, company or organisation that receives communication and may access your Personal Data.
- **"Company"**: Refers to the MN SANTE HOLDING company for users accessing the solution via an invitation from a MN SANTE Customer Healthcare Establishment
- **"Personal Data Protection Policy" and "Policy"**: Refers to this Policy describing the measures taken for the processing, use and management of your Personal Data and your rights as a data subject affected by the processing.
- **"Data Controller"**: Refers to any natural or legal person, public authority, department or body which carries out the processing of your Personal Data and which, alone or jointly with others, determines the purposes and means of the Processing.

- **"GDPR"**: Refers to the General Data Protection Regulation (Regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data).
- **"Processing"**: Refers to any operation or set of operations applied to Personal Data.
- **"Personal Data Breach" means** a breach of security resulting in the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to your Personal Data.
- **"Sub-processor"**: Refers to any natural or legal person, public authority, department or body that processes personal data on behalf of the Data Controller. It acts under the authority of and on the instructions of the Controller.

3. PREAMBLE

The Company places the protection of personal data at the heart of its missions and the services it offers you. This Policy sets out the principles and guidelines for the protection of your Personal Data and aims to inform you about :

- The Personal Data that the Company collects and the reasons for this collection,
- How this Personal Data is used
- Your rights regarding your Personal Data.

This Policy applies to the processing of Personal Data as part of the supply of the Cortex solution to your Healthcare Establishment, excluding any partner sites. All operations on your Personal Data are carried out in compliance with the regulations in force and in particular with the European Regulation on the protection of Personal Data.

4. HOW DOES THE COMPANY PROTECT YOUR PERSONAL DATA?

The Company undertakes to take into account the protection of your Personal Data and your privacy right from the design stage of any new products or services offered to you. To put in place all organisational and technical measures to ensure the protection of your data and to respect our obligations with regard to your rights.

5. HOW DOES THE COMPANY COLLECT YOUR PERSONAL DATA?

The Company undertakes to collect only the data that is strictly necessary for the direct or indirect provision of the services subscribed to when these require the processing of customers' Personal Data.

In the event that you are asked for optional data, the Company will clearly inform you of the Personal Data that is essential for the provision of the subscribed service. For services provided as a subcontractor to your healthcare establishment For your first registration on the kiosk and the management of your account, Personal Data was collected directly from your healthcare establishment. It was necessary in order to respond to the services requested by your Healthcare Establishment.

For data collected for site management and security purposes, personal data is collected from you at the time of connection in the same way as technical and necessary cookies, for which it is not necessary to obtain your consent. This part will be developed in a table below.

6. WHAT ARE THE PURPOSES OF THE PROCESSING CARRIED OUT BY THE COMPANY, ITS LEGAL BASIS AND HOW LONG IS PERSONAL DATA RETAINED?

Depending on the personal data processing carried out, the Company acts as Data Controller or Subcontractor for its customers as indicated above. When the Company acts as Data Controller, the purposes of the processing carried out and the retention periods for Personal Data are set by the Company.

You can consult the purposes of the processing operations, their legal basis and the retention periods for Personal Data resulting from the processing operations carried out by the Company, in its capacity as Data Controller, at the end of this document.

Generally speaking, the purposes, retention period and legal basis differ depending on the services and products concerned. Once the retention periods have expired, Personal Data is rendered anonymous or permanently deleted.

When the Company acts as a Subcontractor for its customers, the purposes of the processing and the period for which the Personal Data is retained are determined by the customer responsible for the processing. In this context, the Company only acts on the instructions of the Data Controller. The processing operations for which the Company acts as Subcontractor are specified in the table at the end of this document.

For any information on the retention periods for Personal Data processed by the Company as a subcontractor, we invite you to contact the healthcare establishment, the Data Controller, which provided for the opening of your account on one of the Companies' solutions for monitoring your healthcare.

Healthcare establishments may be subject to legal obligations to retain Personal Data in their own environments for longer periods than those set out in this data protection policy.

7. WHICH DEPARTMENTS OR COMPANIES ARE GIVEN YOUR PERSONAL DATA?

The Personal Data that you communicate to the Company may be transmitted to the following recipients:

- The Company departments authorised to access this information;
- In certain cases, the company may transmit or store personal data collected and processed on the Cortex solution on behalf of your healthcare establishment to the company's technical service providers, including its subcontractors, within the strict framework of the tasks entrusted to them;
- The Company's partners, subject to your prior agreement;

8. CAN YOUR PERSONAL DATA BE TRANSFERRED OUTSIDE THE EUROPEAN UNION?

The Personal Data processed by the Company is hosted within the European Union (EU) or the European Economic Area (EEA), except for Canadian users, whose Personal Data is hosted in Canada. However, for certain specific services, the Company may use subcontractors established outside the EU or the EEA (e.g. the United States). These subcontractors may have access to Personal Data that is strictly necessary for the performance of their tasks. In this case, in accordance with the regulations in force, the Company requires its subcontractors to provide appropriate guarantees, in particular the signing of standard contractual clauses by the European Commission or the adoption by the latter of Binding Corporate Rules.

9. ARE YOUR PERSONAL DETAILS PROTECTED?

The Company undertakes to take all measures to ensure the security and confidentiality of Personal Data.

In particular, the Company implements all technical and organisational measures to guarantee the security and confidentiality of the Personal Data collected and processed and in particular to prevent it from being distorted, damaged or communicated to unauthorised third parties, by ensuring a level of security appropriate to the risks associated with the processing and the nature of the Personal Data to be protected.

The processing carried out may be subject to audit.

Furthermore, in the event of a Personal Data breach, within the meaning of Article 4 of the GDPR, affecting your Personal Data (destruction, loss, alteration or disclosure), the Company undertakes to comply with the obligation to notify Personal Data breaches, in particular to the competent authority for the protection of personal data in the country concerned.

10. WHAT RIGHTS DO YOU HAVE OVER YOUR PERSONAL DATA AND HOW CAN YOU EXERCISE THEM?

- You have the right to access the Personal Data we hold about you. This includes the right to ask us for further information about :
 - the recipients and categories of recipient to whom your data has been transmitted
 - the purposes of data processing

- where possible, the length of time your data will be kept or, where this is not possible, the criteria for determining this length of time.
- You have the right to ask us to correct inaccurate or incomplete Personal Data concerning you;
- You may object at any time to our use of your Personal Data;
- You have the right to be "forgotten" by us by exercising your right to erasure of your data;
- You have the right to request the suspension of the processing of your Personal Data;
- You may ask for your Personal Data to be recovered in a structured, commonly used and readable format so that it can be made available and transmitted to another data controller;
- You have the option of providing instructions concerning the fate of your Personal Data after your death;
- You may also withdraw your consent at any time in cases where you have been asked to do so. In particular, this will allow you to modify and/or withdraw your consent to commercial prospecting.

The user understands that the aforementioned rights may be tempered, if justified by the legal basis for the processing, without hindering the principle of non-maleficence. To exercise your rights, please contact the DPO of your monitoring institution, which is responsible for processing your data. The contact details are indicated in the GTUs available from your user account.

In the event of difficulty in contacting the DPO of your establishment, you may address your request to MN Santé Holding at dpo-mns@careside.care. MN Santé Holding, as Subcontractor, will have to ask for the agreement of the establishment before proceeding to the deletion of the data.

11. HOW CAN I CONTACT THE COMPANY'S APPOINTED DATA PROTECTION OFFICER?

To obtain the contact details of your Healthcare Establishment's DPO, they are indicated in the GTUs available from your user account.

PROCESSES FOR WHICH THE COMPANY ACTS AS SUBCONTRACTOR (CORTEX solution marketed in web and mobile versions)

SERVICES	PURPOSE	LEGAL BASES	SHELF LIFE
Creation and management of user accounts on the Cortex Solution).	Enable User authentication to applications enrolled in the application kiosk	Performance of the contract concluded with the Customer (Healthcare establishment) Consent of individuals obtained by the health	Retention of data required to manage the account until the account is deleted

		establishment subscribing the service	
Support for Customers in the event of complaints and requests to exercise the rights of users of the CORTEX Solution	<ul style="list-style-type: none"> • Assist healthcare establishment customers to respond to : <ul style="list-style-type: none"> ○ All complaints and requests from users to exercise their rights ○ any request for information from the supervisory and personal data protection authorities 	Performance of the contract concluded with the Customer (Healthcare establishment)	Retention of data relating to the processing of requests for assistance from the establishment, in the context of a dispute, for 5 years from receipt of the request.

12. PROCESSING CARRIED OUT BY THE COMPANY AS DATA CONTROLLER.

As part of the supply of the Cortex solution to your Healthcare Establishment, the Company implements the processing of your personal data in order to manage and secure the solution. In this context, the Company is qualified as the Data Controller.

Data is collected when you connect to the solution, for example via cookies. Please see the table below for a description of the processing, purposes, retention periods and legal basis for our processing. Your consent is not required for any of the processing operations, but we are obliged to inform you.

PROCESSING CARRIED OUT BY THE COMPANY, IN ITS CAPACITY AS DATA CONTROLLER, TO PROVIDE THESE SERVICES

SERVICES	PURPOSE	LEGAL BASES	SHELF LIFE
----------	---------	-------------	------------

Provision of the solution	Provide access to the solution for the Customer and its users	Performance of the contract concluded with the Customer (Healthcare establishment)	Retention of necessary data until termination of contract
Managing and securing the solution	Ensuring access to a secure solution	Performance of the contract concluded with the Customer (Healthcare establishment)	Retention of necessary data until termination of contract
Cookie management	Enabling the use of the solution	Performance of the contract concluded with the Customer (Healthcare establishment)	See table below.

13. WHAT TYPES OF COOKIES ARE USED ON THE SOLUTION?

The data processed includes that collected via the Cookies present on the Solution. The details of this processing are described below.

- **Technical cookies necessary for the operation of the Site**

These cookies are necessary for the proper operation of the Site and to take account of your preferences as a user. They do not contain any personal data. As such, their collection does not require your consent. By placing functional Cookies, we wish to facilitate navigation on the Site. These Cookies ensure the security and performance of the Site. They help to make the Site usable by activating basic functions such as page navigation and access to secure areas of the Site. The Site cannot function properly without these Cookies. They are strictly necessary for its operation and cannot be deactivated without running the risk of no longer being able to access the Site or certain Site services. We use these Cookies in our legitimate interests.

14. What cookies are used on the Site?

The following is a list of Cookies that may be stored on your terminal during browsing, subject to your choices. This list indicates the name of the publisher of the Cookies, the name of the Cookies, their lifespan and their purpose.

In addition to the lifetimes of the Cookies listed below, the personal data collected via these Cookies will only be processed by the Company for a period of 13 months following their collection.

- **Internal cookies deposited directly on the Site domain:**

Cookie publisher	Cookie name	Shelf life	Purpose	Consent
MN Santé Holding	Auth_session_id	Duration of existence of the user's account	Enable authentication to work	No
	Auth_session_id_legacy	Duration of existence of the user's account	Enable authentication to work	No
Keycloak	Keycloak_identity	Duration of existence of the user's account	Enable authentication to work	No
	Keycloak_identity_legacy	Duration of existence of the user's account	Enable authentication to work	No
	Keycloak_session	Duration of existence of the user's account	Enable authentication to work	No
	Keycloak_session_legacy	Duration of existence of the user's account	Enable authentication to work	No
	Keycloak_region	Duration of existence of the user's account	Store the region selected by the user	No
	Keycloak_locale	Duration of existence of the user's account	Store the language chosen by the user	No
	Keycloak_timezone	Duration of existence of the user's account	Store the user's timezone (retrieved from the browser)	No

To exercise your rights in relation to this processing, please contact MN Santé Holding at dpo-mns@careside.care.

La Poste, the group to which our company belongs, has appointed a Data Protection Officer with the CNIL. You can contact him at Délégué à la Protection des Données - CP Y412 - 9 RUE DU COLONEL PIERRE AVIA, 75015 PARIS 15 FRANCE

If, after contacting us, you feel that your rights with regard to your data have not been respected, you may submit a complaint to the Commission Nationale de l'Informatique et des Libertés (3 place de Fontenoy - TSA 80715 - 75334 Paris cedex 07; tel.: 01 53 73 22 22).