

IRIS PRÉVENTION

SECURITY AND PERSONAL DATA
PROTECTION POLICY |
OCTOBER 2024



SECURITY AND PERSONAL DATA PROTECTION POLICY

This personal data protection policy describes how IRIS PRÉVENTION - FRANCE SURGERY (hereinafter “we” or “us”) processes the personal data of users of the services and their beneficiaries and of any other Internet user or user of this website (hereinafter “you”).

We act as a Data Controller, in accordance with the definition given in the General Data Protection Regulation of April 27, 2016. As such, we are responsible for any use of your personal data that we may make of it or that may be made on our behalf.

This policy may be updated regularly.
Last update : 09/10/2024

This policy consists of ten (10) sections:

1. About us
2. Platform hosting
3. Personal data
4. Information collected and its use
5. Sharing your information and our relationship with third parties
6. The legal basis for the use of your data
7. International data transfers
8. Retention of your data
9. Data security
10. Your rights
11. Cookies and other trackers

1. ABOUT US

The Iris platform is published by FRANCE SURGERY, located at 11 Rue Saint Expédit 31500 Toulouse, a simplified joint stock company with a share capital of 43,780.00 euros, registered with the RCS TOULOUSE under number 515 151 835 - Intra-Community VAT number: FR 10515151835.

FRANCE SURGERY offers medical assistance, health prevention, videotransmission health prevention service and Second Medical Opinion services.

Our contact details :

Phone number: +33 (0) 9 53 02 03 09,

E-mail: contact@iris-prevention.fr

The publication manager is: Ms Carine Briat-Hilaire.

We have appointed a Data Protection Officer (hereinafter "DPO") to oversee FRANCE SURGERY's use of your personal data. You can contact the DPO to answer any questions you may have about the processing of your data and to exercise your data protection rights (see section 8 below).

Contact details for the Data Protection Officer: dpo@iris-prevention.fr

2. PLATFORM HOSTING

The personal data collected and processed in connection with the services offered by the Iris platform are hosted by CLARANET, located at 2 rue Bréguet, 75011 Paris (France), registered with the Paris Trade and Companies Register under number 419 632 2869, holder of the "Agrément Hébergeur de Données de Santé" (AHDS) issued by the Minister of Health, in accordance with the provisions of article L.1111-8 of the French Public Health Code.

3. PERSONAL DATA

Respect for privacy is a fundamental right and one of France Surgery's core values. France Surgery is committed to complying with French and European regulations on the protection of personal data, in particular the General Data Protection Regulation (EU) of April 27, 2016 ("RGPD") and the amended French Data Protection Act of January 6, 1978 ("LIL").

You have the right to receive information about your stored personal data, their origin, recipients and purpose of storage, delete these data. You can permanently revoke the consent you have given us at any time. You can inform us informally to exercise your rights: contact@iris-prevention.fr

4. INFORMATION COLLECTED AND ITS USE

As Data Controller, we undertake to comply with the following principles:

- Only data that is relevant and useful to the provision of our services is collected,
- Your data will only be used for explicit, legitimate and specific purposes related to our business. Some of the data collected may be sensitive (health data). This data is never communicated to third parties (except to a medical expert within the framework of the Second Avis Médical service) or transferred to countries outside the European Union or to countries that do not benefit from an adequate level of protection (except within the framework of the execution of your medical assistance contract, when this is necessary for the organization and provision of services),
- Your data is kept for the time required to provide our services, in accordance with the legal retention period.

Your data collected via the Iris platform is used for the following purposes:

- The performance of your services in the context of a request for a second medical opinion, face-to-face medical check-up, digital medical check-up, organization of care, videotransmission health prevention service, etc.
- Preparation and analysis of anonymized aggregate statistics.

Some of your personal data is communicated to us by our partners who have collected it when you took out your contract. They provide it to us so that we can check your eligibility for our services. This information may include, but is not limited to:

- Name (of the policyholder and any other beneficiaries of the policy) ;
- Address and contact details, including telephone and e-mail;
- Health data;
- Level of cover and information relating to the insurance or assistance contract or any other contract.

5. SHARING YOUR INFORMATION AND OUR RELATIONSHIP WITH THIRD PARTIES

We may communicate some of your personal data (excluding medical data), for the purposes listed above, to our service providers, subcontractors, lawyers, experts, supervisory authorities and authorized public or private professional bodies that require it in the course of their activities.

Apart from the recipients listed above, and unless we are obliged to do so by a judicial authority or by law or to protect our rights and interests, we undertake not to communicate, share, make available or sell your personal data to third parties without your express consent.

We use Calendly, our subcontractor for appointment scheduling. Calendly is integrated into our platform as a cloud application that provides meeting/appointment scheduling as a service. Our platform creates a seamless experience for scheduling meetings through secure integration with suppliers to check user availability. Calendly applies security best practices, keeping customer data to a minimum and operating with the fewest privileges necessary to deliver an exceptional experience.

Our appointment scheduling software is designed to require the most limited access to customer resources for a seamless appointment scheduling experience. We never store any of your calendar details. We are continually attentive to our customers' confidentiality and limit access to all customer data according to their needs.

The Calendly application is hosted on Kubernetes / Google Cloud Services (GCS). GCS data center operations have been accredited under :

ISO 27001

SOC 1 and SOC 2/SSAE 16/ISAE 3402 (formerly SAS 70 Type II)

PCI level 1

FISMA Moderate

Sarbanes-Oxley (SOX)

Calendly is committed to complying with the General Data Protection Regulation (RGPD). Calendly has designed its data privacy program to be RGPD compliant.

6. THE LEGAL BASIS FOR THE USE OF YOUR DATA

We collect, use and communicate your personal data in order to respond to your requests, provide assistance services or any other services provided for in your contract.

The collection, processing and communication of your personal data may be based on a legal obligation, when we are requested to do so by public authorities or supervisory authorities.

When we collect and process sensitive data (data relating to your health), we do so as part of the execution of your medical assistance request or contract, or we separately obtain your explicit consent, as part of our health prevention, care organization, videotransmission health prevention service and Second Medical Opinion activities.

1. Creation and management of the User Account (creation of the User Account, verification of the identity and right to practice of Healthcare Actors, traceability requirements, etc.).

Legal basis for processing : To meet traceability requirements: France Surgery keeps data for 10 years (article 1649 ter D du Code Général des Impôts).

2. Creation of a directory and User Profile files for all healthcare professionals.
Identity data: Civil status, surname, first name, title
Professional data: Telephone number, business address, photograph, RPPS number, Adeli number.

Legal basis for processing : Until request for deletion (30 to 60 days after receipt of request)

3. Provision of information about the Services (new features, service user guides, new products, etc.).

Legal basis for processing : Duration of contractual relationship

4. Videotransmission Health Prevention Service operation
Videotransmission session information: errors & bugs, videotransmission start and end times, video and sound throughput, status of equipment used for videotransmission (battery level, camera and microphone access).

Legal basis for processing: 3 months after video transmission

5. Customer relationship management Support request management

Identification data: User ID, surname, first name Contact data: Telephone number, address and email Professional data: Specialization, organization in which the User works Account data: Subscribed services, Administrator status.

Legal basis for processing : Conversations are kept for a period of 6 months. In order to protect itself against any litigation, France Surgery may retain certain information for up to 5 years from the end of the contractual relationship.

6. Information on changes to the Services

Legal basis for processing : Duration of the contractual relationship for updates necessary to maintain the conformity of the services: legal obligation (art. L.224-25-25 Consumer Code)

7. Billing and payment management Billing, collection, reporting and statistics

Identification data: first name, last name, address, email, telephone number, customer account number, SIRET, VAT number. Economic and financial data: bank account number, mandate information, reason for payment rejection, payment method, payment schedule.

Legal basis for processing: 10 years: Invoicing and collection: Legal obligation (art.289 General Tax Code and art. 1234-22 Commercial Code)

8. Mandatory information collection and declaration for online platforms

First and last name, address, telephone number, e-mail address, taxpayer identification number (TIN), date of birth (and place of birth for natural persons without a TIN), sole proprietorship identification number (SIREN), VAT number.

Legal basis for processing: Legal obligation (DAC7; Digital Service act)

For telephone number and e-mail address: 6 months after the end of the contractual relationship with the practitioner concerned For all other information: 10 years after the year in which a declaration using this information was filed.

For security reasons, in particular to ensure the continuity of its services, certain personal data may be stored by France Surgery in protected backup files. In the event of restoration of these backup files, the retention periods indicated above will automatically be taken into account.

7. INTERNATIONAL DATA TRANSFERS

We do not transfer personal data to third parties outside the European Union or to countries whose regulations do not guarantee an adequate level of protection.

8. RETENTION OF YOUR DATA

By default, personal data and health data collected by France Surgery with the user's consent, are kept for 5 years from the last activity of the user and archived for 10 years, in accordance with article L. 1111-18 of the CSP (CNIL).

At the request of France Surgery's customer:

- the retention period for this data can be reduced.

NB: personal data linked to a user account is kept until the account is deleted.

We undertake to keep your personal data secure, confidential and accurate for the period of use authorized herein.

At the end of the retention period, your personal data will be rendered anonymous or destroyed.

9. DATA SECURITY

We are committed to ensuring the security of your data by implementing physical and logical security measures.

We regularly review the technical and organizational security measures we have implemented in our information and communication systems to prevent the loss, misuse or unauthorized alteration of your data.

Communications via our website, social networks or e-mail depend on the Internet, which is a public network.

FRANCE SURGERY has implemented an appropriate procedure to identify and communicate any data breach incident within seventy-two (72) hours and to resolve it within a reasonable time. You are responsible, where applicable, for the confidentiality of the password you use to access our website. We will not ask you for your password except when you log on to the site.

10. YOUR RIGHTS

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

- You may access your personal data and obtain a copy;
- You may request that inaccurate personal data be corrected or supplemented;
- You may object to the processing of your personal data or ask us to delete it, unless we are legally obliged to do so or have a legitimate interest in keeping it;
- You may ask us to restrict the use of your data in the cases provided for by law;
- You have the right to receive a copy of the data you have given us, or to have a copy sent to another company (data portability) in a machine-readable format, where we process your data electronically;
- You may withdraw your consent to the use of your data at any time,
- You may lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL) regarding the way in which we process your personal data.

Please note that there are certain restrictions and exceptions applicable to the exercise of your rights, depending on the circumstances.

Please refer to the contact details given in section 9, below, in order to exercise or obtain more information about exercising your rights (mentioning the subject of your request).

For further information, please consult the CNIL website (<https://www.cnil.fr>).

11. COOKIES AND OTHER TRACKERS

What is a cookie?

A cookie is a small text file placed on your hard drive by the website you visit. It is generally used to record data related to your visit, such as choices or preferences you may have made.

How and why do you use cookies?

We use cookies to provide you with the best possible browsing experience when you visit our site. By using cookies, we make it more intuitive.

The cookies we use also enable us to personalize the content of our website. In this way, we can offer you services or advertising tailored to your needs.

Security of your personal data

Our cookies do not store personal information such as your name, address, telephone number or e-mail address in a format that can be read by third parties. The cookies we use cannot read information stored on your computer, smartphone or other digital device connected to the Internet. They do not access your personal information, nor that of your family, nor information stored on your hard disk.

A minority of the cookies we use store encrypted information, notably when you click on the "Remember me" function, which enables us to automatically record your user name when you visit our site. However, the data is encrypted so that only France Surgery can read this information.

Types of cookies used on this site

Tracking cookies are essential for navigation.

Without them, you simply wouldn't be able to navigate our site and use its various functions. They collect and record the information we need to operate our website. These cookies are only effective during your browsing. When you leave our site, they are deleted.

How can I manage and deactivate cookies?

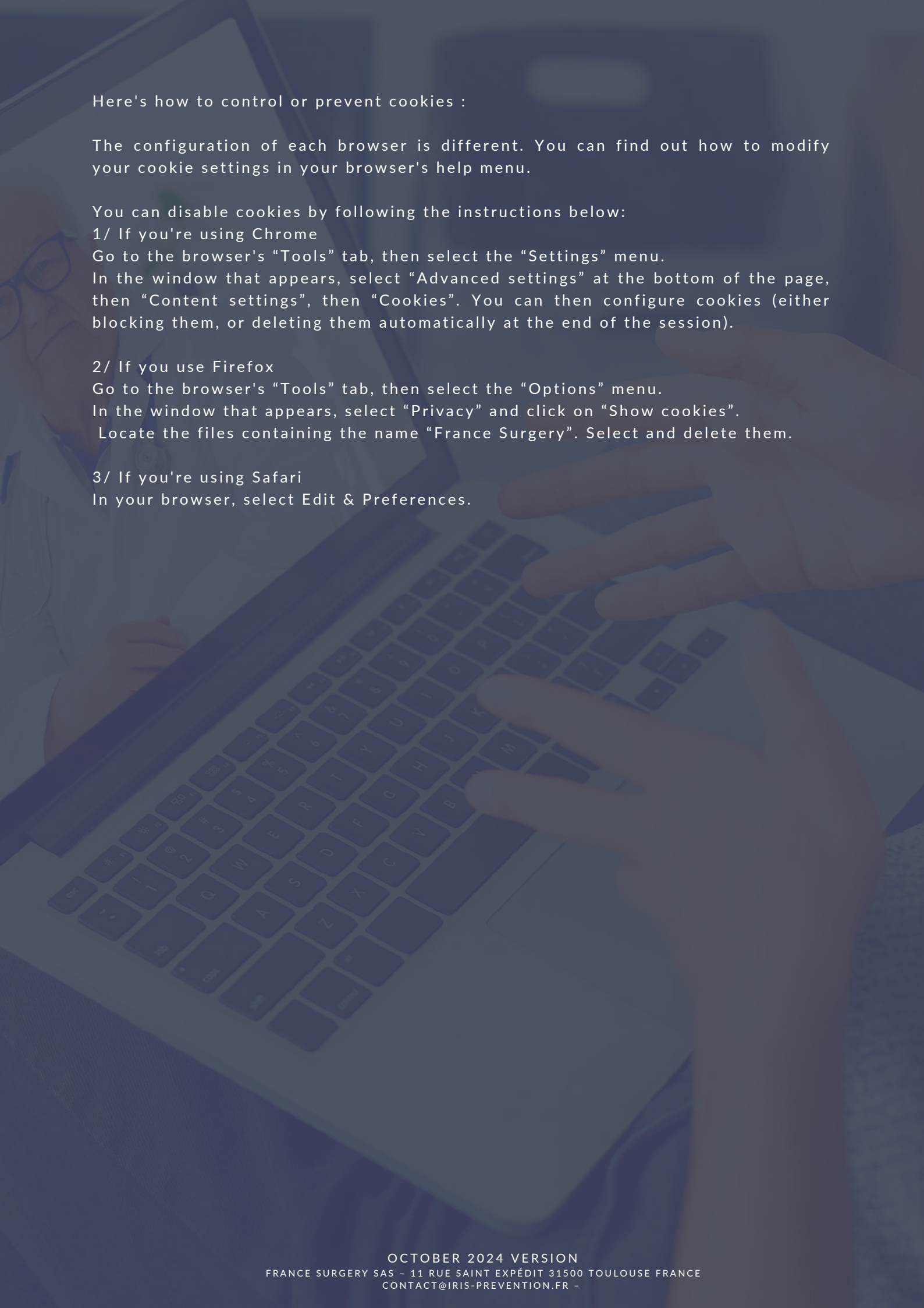
There are several ways to manage cookies:

Setting your browser parameters

You can choose to disable cookies at any time. Your browser can also be set to notify you when cookies are placed on your computer, and to ask you whether or not you wish to accept them. You can accept or refuse cookies on a case-by-case basis, or systematically refuse them once and for all.

We remind you that this setting may modify your conditions of access to our services requiring the use of cookies.

If your browser is configured to refuse all cookies, you will not be able to take advantage of essential functions on our site, such as receiving personalized recommendations. In order to manage cookies more closely to your expectations, we invite you to configure your browser taking into account the purpose of cookies as mentioned above.



Here's how to control or prevent cookies :

The configuration of each browser is different. You can find out how to modify your cookie settings in your browser's help menu.

You can disable cookies by following the instructions below:

1/ If you're using Chrome

Go to the browser's "Tools" tab, then select the "Settings" menu.

In the window that appears, select "Advanced settings" at the bottom of the page, then "Content settings", then "Cookies". You can then configure cookies (either blocking them, or deleting them automatically at the end of the session).

2/ If you use Firefox

Go to the browser's "Tools" tab, then select the "Options" menu.

In the window that appears, select "Privacy" and click on "Show cookies".

Locate the files containing the name "France Surgery". Select and delete them.

3/ If you're using Safari

In your browser, select Edit & Preferences.