

## PRIVACY STATEMENT

Focal Meditech is a manufacturer and supplier of medical aid devices for people with disabilities. In connection with its business activities, Focal Meditech processes personal data. Personal data are for example name, address, place of residence and date of birth of a client or name and phone number of the therapist who assists a client with their request for a medical aid. Furthermore, personal data processed by Focal Meditech include for example name, citizen service number and bank account number of Focal Meditech employees.

It goes without saying that the processing of this data should be done with extreme care. Respect for the privacy of clients, employees and others involved in the advice and delivery process is therefore the guiding principle for Focal Meditech in all its activities. Focal Meditech processes personal data exclusively in accordance with the applicable EU legislation. In the Netherlands, this is regulated by the *General Data Protection Regulation (AVG)*.

Below, you can read how Focal Meditech implements the privacy rights of its clients.

### What personal data does Focal Meditech process and for what purposes?

Focal Meditech develops, advises, delivers and repairs medical aid devices for people with a disability. For these activities and the associated administrative processing, Focal Meditech requires a minimum amount of personal data such as name, address, place of residence, telephone number and possibly other contact information. We need this information to be able to carry out your order.

During any initial contact, for example when you request an information leaflet or want to schedule an appointment for advice, the information you provide is not stored in our customer database. If, after receiving advice regarding a device from Focal Meditech, you would like to submit an application, for example to your health insurance company, we will store your data for further processing, in accordance with the AVG. At this point, you have given us a (verbal) order and we may process your data. We need your data in order to provide you with a quote, to process the order, to deliver the device and to perform any service activities. We will only process data which is necessary for the purpose in question ("minimal data processing").

If an aid device is reimbursed by a health insurance company, Focal must also process your date of birth, your customer number, and your Citizen Service Number (BSN). The latter is necessary to comply with a legal obligation as stipulated in the *Act on the Use of Citizen's Service Numbers in Healthcare (Wet gebruik Burgerservicenummer in de zorg)*.

Focal Meditech processes your medical data insofar as they are necessary for an adequate provision of a medical aid device. The processing of medical data is regulated in the *Health Insurance Act (Zorgverzekeringswet)*.

If, for example, the installation of an aid on your wheelchair requires one or more photographs in which you are fully or partially shown, we will always ask you for permission to use the image material via a permission statement.

Focal Meditech never uses your information for purposes other than described above without your permission.

## **How does Focal Meditech process and secure your personal data?**

Your data is recorded in a computer system, which meets strict security requirements, preventing unauthorised access from the outside as much as possible.

Focal Meditech employees are trained in handling personal data and are aware of the risks and their responsibility. Employees have specific login profiles that only allow access to those personal details that are necessary for the execution of a well-defined task.

The Citizen Service Number and medical data are a special category of personal data that require special protection because of their sensitivity. For this purpose, Focal Meditech has taken appropriate measures, both at ICT level and in terms of special access rights for a limited group of employees.

Focal Meditech limits the collection of personal data and their processing to the purposes for which they are processed. For example, the Citizen Service Number is necessary to check your insurance entitlement at the start of the process (determining which health insurance company you are insured with) and when declaring the costs of the device to your health insurance company.

## **Policy regarding third parties**

Focal Meditech may use third parties to provide some of its services. If the processing of personal data is not the primary task in the outsourcing, the service provider has its own responsibility regarding the AVG. Focal Meditech shall inform the client if part of the service is being performed by a third trusted party. If the processing of personal data is a primary task, Focal Meditech concludes a processor agreement with the service provider, in accordance with the AVG.

## **How long does Focal Meditech keep your data?**

Focal Meditech adheres to the legal retention periods for this kind of data. Focal Meditech keeps your data for at least 7 years.

## What are your rights?

The AVG explicitly gives you the right to see, correct or delete the data we have received from you. Deleting data is possible unless a (legal) restriction applies.

## What happens if your data unintentionally ends up with unauthorised third parties?

If, for any reason, personal data ends up in an unauthorised location, it may be a case of a data breach. Should this be the case, Focal Meditech reports this to the Personal Data Authority (AP) according to the regular procedure. Focal Meditech also informs the person(s) involved.

## Complaints

If the way in which we process your data gives rise to any questions, comments or complaints, we kindly request you to contact us via telephone number 013-5333103 or email at [info@focalmeditech.nl](mailto:info@focalmeditech.nl).

## Changes to this Privacy Statement

Focal Meditech may change this Privacy Statement from time to time. Any changes will be published on our website.

We therefore recommend that you consult this privacy statement regularly, so that you are aware of the most recent changes.