

Privacy Statement

We understand that your trust in us, is EPILOG's most important asset (hereinafter referred to as "EPILOG", "we" or "us"). As such, your privacy is essential for us.

This privacy statement (hereinafter referred to as "**Privacy Statement**") is applicable, inter alia, to **(i)** our website <https://www.epilog.care/> and our platform(s) (such as <https://preop-europe.epilog.care> and <https://diagnostic.epilog.care>) (hereinafter referred to as the "**Website**") and **(ii)** all (commercial) relations between EPILOG and its customers, prospects and business partners.

This Privacy Statement includes information about the personal data collected by EPILOG, as well as the manner in which EPILOG uses and processes this personal data.

EPILOG wishes to emphasize that it always attempts to act in accordance with the applicable privacy legislation in Europe/Belgium: including **(i)** the Belgian Privacy Law of 30 July 2018 concerning the protection of individuals with regards to the processing of personal data, **(ii)** the EU Regulation of 2016 concerning the protection of individuals with regards to the processing of personal data, regarding the free movement of such data and repealing Directive 95/46/EC and/or **(iii)** all (future) Belgian laws regarding the implementation of this Regulation and the applicable privacy legislation in the United States: including **(i)** the Health Insurance Portability and Accountability Act of 1996, **(ii)** the Health Information Technology for Economic and Clinical Health Act and **(iii)** all rules, regulations, and related laws and acts promulgated under and in connection therewith.

Types of personal data

EPILOG can collect and process the following personal data:

- First name
- Last name
- Account name
- Password
- Email address
- Company name
- IP address
- Data concerning the use of EPILOG's services
- All personal data freely provided to EPILOG (e.g. in light of correspondence with EPILOG)

EPILOG also automatically collects anonymous information regarding your use of the Website. As such, EPILOG shall, for automatically log which sections of the Website you visit, which web browser you use, which website you visited when you obtained access to the Website. We cannot identify you through these data, but it allows EPILOG to draw up statistics regarding the use of the Website. EPILOG is not using cookies for more personalized advertising.

Methods of personal data collection:

- These personal data are collected in the context of:
- Any cooperation with EPILOG
- Appealing on the services of EPILOG
- Creation of a (demo-)account on the Website
- Visiting the Website
- Requesting an offer
- A (sales) meeting
- Incoming and outgoing correspondence with EPILOG
- Subscription to a webinar/seminar/event/etc.
- Via social media channels (e.g. LinkedIn)
- Exchanging business cards

Providing certain personal data is (sometimes) a requirement to be able to enjoy certain services (e.g. to gain access to certain parts of the Website, to subscribe to newsletters, to participate in certain activities and events). In this respect, it shall be indicated which data must be provided mandatory and which data is optional.

Use of personal data

EPILOG can use your personal data for the following purposes:

- Performance of the agreement with EPILOG (incl. follow-up thereof)
- For compliance reasons - to comply with lawful requests.
- To consider applicant candidacy for working at Epilog or as consultant.
- Drawing up a quote/offer
- Responding to questions
- Creation of an account (free or paying) and the confirmation thereof
- Providing support/assistance (e.g. in case of problems)
- Conducting customer satisfaction studies, surveys and other market research
- Follow-up after a meeting or call
- Sending newsletters

- Send targeted marketing and advertising, updates and promotional offers based on your preferences and – where applicable – upon explicit consent
- Optimising the quality, management and content of the Website
- Issuing invoices and the collection thereof
- Security of the Website and the services
- Sending newsletters
- Creating statistics

Processing takes place on the following legal grounds, as the case may be:

- You have given consent to the processing of your personal data for one or more specific purposes
- Processing is necessary for the performance of the agreement with EPILOG or in order to take steps at your request prior to entering into an agreement
- Processing is necessary for compliance with a legal obligation to which EPILOG is subject
- Processing is necessary in order to protect your vital interests or of another natural person
- Processing is necessary for the performance of a task carried out in the public interest
- Processing is necessary for the purposes of the legitimate interests pursued by EPILOG (e.g. protection of the Website) or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, which require protection of personal data (in particular when you are a child).

Disclosure of personal data to third parties

EPILOG shall not disclose your personal data to third parties, unless this should be necessary for one of the aforementioned purposes (including but not limited to accounting, marketing, transport of deliveries, payment processing, database management and the delivery of services to EPILOG (i.e. in light of subcontracting)). In this respect, your personal data may be disclosed to external (IT) consultants, payment providers, software providers, cloud partners, transport partners, financial institutes, insurance companies and other service providers (e.g. photograph, translator, etc.).

Processing by the third-party shall be governed by a contract or other legal act under Union or Member State law, that obligates the third-party to handle or process your personal data at least as restrictive as EPILOG itself and that sets out (i) the subject-matter and duration of the processing, (ii) the nature and purpose of the processing, (iii) the type of personal data, and (iv) categories of data subjects and the obligations and rights of EPILOG.

Notwithstanding the foregoing, it is however possible that EPILOG discloses your personal data:

- To the competent authorities (i) if EPILOG is obliged to do so under the law or under legal or future legal proceedings and (ii) to safeguard and defend our rights
- If EPILOG, or the majority of its assets, are taken over by a third party, in which case your personal data – which EPILOG has collected – shall be one of the transferred assets

In all other cases, EPILOG will not sell, hire out or pass on your personal data to third parties, except when it (i) has obtained your permission to this end and (ii) has completed a data processing agreement with the third party in question, which contains the necessary guarantees regarding confidentiality and privacy compliance of your personal data.

Transfer of personal data to third countries

Any transfer of personal data to a third country or international organization shall be subject to an adequacy decision by the Commission or one of the following safeguards:

- A data transfer agreement, which shall contain (i) the standard contractual clauses, as referred to in the 'European Commission decision of 5 February 2010 (Decision 2010/87/EC)', or (ii) any other mechanism pursuant to privacy legislation, or any other regulations pertaining to the processing of personal data; and/or
- Binding corporate rules; and/ or
- Certification mechanisms (such as but not limited to the EU-US Privacy Shield).

Storage of personal data

Unless a longer storage period is required or justified (i) by law or (ii) through compliance with another legal obligation, EPILOG shall only store your personal data for the period necessary to achieve and fulfil the purpose in question, as specified in the Privacy Statement under 'Use of personal data'.

Your privacy rights

In light of the processing of your personal data, you enjoy the following privacy rights:

- **Right to withdraw consent:** you have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before the withdrawal.
- **Right of access by the data subject:** you can ask for confirmation of whether or not personal data that relates to you is being processed, as well as more clarifications about the information referred to in this information notice. You have the right to request a copy of the personal data undergoing processing.

- **Right to rectification:** you can request to correct or supplement the data provided to us, if (no longer) inaccurate.
- **Right to erasure ('right to be forgotten'):** please be aware that in this context certain services will no longer be accessible and/or can no longer be provided (e.g. delivery of the ordered products) if you delete resp. request deletion of certain required personal data.
- **Right to restriction of processing:** you can object to the processing of your data at any time, unless there are legitimate reasons for proceeding with the processing that prevail over yours, for example for the exercise of a right or our defence in court. The aforementioned limitations do not apply where personal data are processed for direct marketing purposes.
- **Right to data portability:** you can request to receive the data you provided, or to send it to another entity indicated by you, in a commonly used structured format readable by automatic device.
- **Right to lodge a complaint:** in case you are not satisfied with the way EPILOG handled your requests, questions and/or remarks or have any complaints about the way EPILOG collects, uses and and/or processes your personal data, note that you have the right to submit a complaint to or appeal on the competent Data Protection Authority.

At any time you can exercise your privacy rights towards EPILOG by contacting us (i) via email (privacy@epilog.care), or (ii) by completing the form for exercising your privacy rights and deliver it to EPILOG by email or post.

In principle, you can exercise these rights free of charge via the above-mentioned form.

Where and as permitted under applicable law, EPILOG may process your contact information for marketing purposes. In case you no longer wish to receive newsletters or information about the services and/or products of EPILOG, you can unsubscribe at any time by clicking the "unsubscribe" button underneath each of EPILOG's emails.

Security of personal data

EPILOG undertakes to take reasonable, physical, technological and organisational precautions in order to avoid (i) unauthorised access to your personal information, and (ii) loss, abuse or alteration of your personal data.

Notwithstanding EPILOG's actions in this context, an infallible level of security cannot be guaranteed. Since no method of transmission or forwarding over the internet, or any method of electronic storage is 100% secure, EPILOG is, in this context, not in a position to guarantee absolute security.

Finally, the security of your account will also partly depend on the confidentiality and complexity of your password. EPILOG will never ask for your password, meaning that you will never be required to communicate it personally. If you have nonetheless communicated your password to a third party – for example because this third party has indicated that it wishes to offer additional services - this third party shall have access to your account and your personal data via your password. In such cases, you are liable for the transactions which occur as a result of the use made of your account. EPILOG therefore strongly advises you, if you observe that someone has accessed your account, to immediately change your password and contact us.

Update Privacy Statement

EPILOG is entitled to update this Privacy Statement by posting a new version on the Website whereby EPILOG will indicate the revision date at the top of the first page of this Privacy Statement. As such, it is strongly recommended to regularly consult the Website and the page displaying the Privacy Statement, to make sure that you are aware of any changes.

Other websites

The Website may potentially contain hyperlinks to other websites. When you click on one of these links, you may be redirected to another website or internet source that could collect information about you through cookies or other technologies. EPILOG does not bear any responsibility, liability or control authority over these other websites or internet resources, nor about their collection, use and disclosure of your personal data. You must check the privacy statements of these other websites and internet sources in order to be able to judge whether they act in accordance with the Privacy Legislation.

Contact EPILOG

If you have questions and/or remarks about this Privacy Statement or the manner in which EPILOG collects, uses and/or processes your personal data, please contact us:

- Via e-mail: privacy@epilog.care

or

Via mail:

- Ghent office: Vlasgaardstraat 52, 9000 Gent, Belgium
- New York City Office: 1177 Avenue of the America's, 7th Floor, 10036 New York, USA