

Privacy policy.



Opal Solutions

Let's refocus healthcare on
people.

Update in novembre 2022

The present privacy policy ("*privacy policy*") defines and informs customers and visitors to the website of the way in which SPR Opal Solutions, hereinafter "Opal Solutions" uses and protects the information transmitted to it and, in particular but without being exclusive, when the client or visitor uses the services offered by Opal Solutions or this website, accessible via the link www.opalsolutions.be. For convenience, both the customer and the visitor to this website are referred to in this privacy policy as "the customer".

This privacy policy may be modified or supplemented at any time by Opal Solutions, in particular with a view to complying with any legislative, regulatory, jurisprudential or technological developments. In such a case, the date of its update will be clearly identified at the top of this policy. These modifications commit the customer as soon as they are put online. The customer is therefore invited to regularly consult this privacy policy, as well as the rules on the use of cookies in order to be aware of any changes.

I. PERSONAL DATA

In general, it is possible to visit the site without communicating any personal information. In any case, the customer is in no way required to transmit this information to Opal Solutions.

However, in certain situations of absence of transmission of information, it is possible that the customer cannot benefit from the requested services. Indeed, in order for the customer to benefit from the services offered by Opal Solutions, the latter may, in certain cases, be required to ask you to enter your surname, first name, addresses (e-mail and postal address), hereinafter the "personal information" or "personal data". By transmitting this information, the customer expressly accepts that it will be processed by Opal Solutions, for the purposes indicated in point 2 below as well as for the purposes mentioned at the time of each request.

In accordance with the General Data Protection Regulations (GDPR) of April 14, 2016, Opal Solutions informs you of the following points:

1. Identity of the data controller

The data controller is

Opal Solutions SRL
Rue Louis de Geer 6 at 1348 Louvain-La-Neuve
E-mail. dpo@opalsolutions.be

The data controller ensures the accuracy and relevance of the personal data collected and processed. In addition to the above, it ensures that they comply with applicable regulations and this Privacy Policy.

2. Data collected

Opal Solutions collects personal data from patients and healthcare professionals. The data collected is as follows

- language of use, surname, first name, postal address, e-mail address, mobile number;
- date of birth, passport photo, family data;
- weight, gender, blood sugar, other medical data;
- Bank account ;
- internet browser used, browsing mode used (PC or mobile).

In certain situations, the VAT number and the INAMI number can be collected for professional customers.

3. Purposes of processing

Opal Solutions is likely to process the personal information transmitted for the following purposes:

- to provide the information or services requested by the customer and adapted to it, and more particularly:
 - statistics of visits to the Opal website Solutions
 - the presentation of the services offered and provided by Opal Solutions
 - respond to contact requests made via the website www.opalsolutions.be.
- collect information allowing Opal Solutions to improve the site, products and services (in particular by means of cookies);
- allow the customer to access the services of Opal Solutions under the best possible conditions;
- manage the contracts concluded between the client and Opal Solutions with regard to its legal and contractual obligations.

4. Recipients

Only Opal Solutions is the recipient of the personal information provided.

These, whether in individual or anonymized form, are in no way transmitted to a third party, with the exception of subcontractors, external service providers or partners to whom Opal Solutions calls in the context of its legal obligations. or contractual or as part of the achievement of its corporate purpose, in order to ensure a complete and adequate service to the customer and visitor.

Neither Opal Solutions, nor one of its subcontractors, external service providers or partners, sells the personal data of customers of the site and of Opal Solutions.

5. Retention

period Personal information is retained by Opal Solutions only for the time corresponding to the purposes of the collection as set out above. In any case, except for another retention period imposed by a legal or contractual obligation, the retention of data will not exceed 10 years, and 5 years for unused data.

6. Data storage location

The company stores the data on computer media and, mainly, on an internal server of Opal Solution as well as in clouds:

- AWS whose privacy policies can be consulted via the links:
https://d1.awsstatic.com/legal/privacypolicy/AWS_Privacy_Notice__French_Translation.pdf;
- OVH whose privacy policies can be viewed via the links:
<https://www.ovhcloud.com/fr/personal-data-protection/>

The company makes every effort to guarantee data security by implementing technical and organizational measures that comply with the standards applicable for this type of data and company.

7. Customer's rights

The customer benefits from the following rights, in accordance with the aforementioned European regulation:

- **Right of access and communication of data**

The customer has the right to access and consult the personal data concerning him, kept by Opal Solutions. The client can also find out how Opal Solutions obtained them as well as the people to whom they are communicated.

Given the obligation of security and confidentiality in the processing of personal data which is incumbent on Opal Solutions, the request for access and consultation of the data formulated by the customer will be

processed subject to addressing the proof of his identity, in particular by producing an electronic or paper copy (accompanied by a signature) of his identity card during the period of validity thereof. The request is, in any case, free for the customer.

Opal Solutions may, however, object to manifestly abusive requests (by their number or their repetitive or systematic nature, for example).

- **Right to rectify data**

The European regulation allows the customer to request the rectification, updating or deletion of data concerning him and which may prove to be inaccurate, erroneous, incomplete or obsolete.

- **Right of opposition**

The customer has the right to oppose the processing of data in the following two situations:

- when the exercise of this right is based on legitimate grounds; or
- when the exercise of this right aims to prevent the data collected from being used for commercial prospecting purposes.

- **Right to erasure**

The customer has the right to request and obtain the erasure of the data concerning him held by Opal Solutions.

Opal Solutions will accede to the client's request if

- the personal data is no longer necessary for the purposes for which it was collected;
- the processing of the data was based exclusively on the consent of the customer and that the latter withdraws his consent;
- the customer objects, for well-founded reasons, to the processing.

In any event, the request for erasure may be refused by Opal Solutions if the request is necessary for the exercise or defense of legal rights or for compliance with a legal or contractual obligation on the part of Opal Solutions. .

- **Right to data portability**

The customer may request that his personal data be transmitted to a data controller identical to Opal Solutions. The client can therefore ask Opal Solutions to transmit the data to him in a structured, commonly used and machine-readable format.

- **Procedures for exercising rights**

The aforementioned rights can be exercised by sending a letter to the address of Opal Solutions or by sending an e-mail to the following address: privacy@opalsolutions.be.

8. Response

times Opal Solutions will accede to the visitor's request by reply formulated on the basis of a mode identical to that used for the exercise of his right by the visitor.

Opal Solutions undertakes to respond to any request for access, rectification or opposition, erasure or any other additional request for information within a reasonable time and in any event, within a maximum period of 1 months from receipt of your request.

Depending on the complexity of the request, the response time may be extended to 3 months, in accordance with the applicable European regulation.

9. Persons authorized to consult personal data

Only members of staff and administrators of Opal Solutions are authorized to consult personal data, with the exception of the application of point 3 above. These people reasonably need the data because of the tasks and missions entrusted to them or the necessities related to the activity of Opal Solutions.

10. providers and transfer to a third country of the European Union

Opal Solutions also informs the customer that it uses authorized service providers to facilitate the collection and processing of the data communicated. These service providers may be located outside the European Union.

Opal Solutions has previously ensured the implementation by the service providers of adequate guarantees and compliance with strict conditions in terms of confidentiality, use and data protection. In particular, vigilance has focused on the existence of a legal basis for carrying out any transfer of data to a third country.

11. Complaint to the competent authority

Opal Solutions hopes that any possible difficulty related to the processing of personal data will be resolved through dialogue.

However, if this cannot be the case, the customer has the right to lodge a complaint with the Data Protection Authority.

The Data Protection Authority is located rue de la Presse 35 in 1000 Brussels, it can be reached by telephone on +32 2 274 48 00 or by e-mail at contact@apd-gba.be.

II. POLICY RELATING TO COOKIES

When connecting to the Opal Solutions website for the first time, the customer is informed that information relating to navigation is likely to be recorded in files called "cookies".

A cookie is an invisible piece of information saved by a website within the computer's Internet browser. This "cookie" can be retrieved during a subsequent visit to this same site. The "cookie" cannot be read by a website other than the one that created it. Most "cookies" only work during a session or visit. None of this information is communicated to third parties except when Opal Solutions has obtained the customer's prior consent or when the disclosure of this information is required by law, by order of a court or any administrative or judicial authority empowered to take cognizance of it.

This use is made by Opal Solutions in order to facilitate navigation on the Opal Solutions website.

Some cookies are exempt from the prior collection of the customer's consent insofar as they are strictly necessary for the operation of the website or have the exclusive purpose of allowing or facilitating communication by electronic means. These include session identifier cookies, authentication cookies and interface personalization cookies. These cookies are fully subject to this policy insofar as they are issued and managed by Opal Solutions.

Other cookies, issued by third parties, are qualified as "persistent". These remain in the customer's terminal until they are erased or expire.

Since such cookies are issued by third parties, their use and deposit are subject to their own privacy policies, the links of which are given below. This family of cookies includes audience measurement cookies, advertising cookies (which Opal Solutions does not use) and social network sharing cookies (including Facebook and LinkedIn)

Audience measurement cookies establish statistics concerning the frequentation and use of various elements of the website (such as the content/pages visited). This data contributes to improving the ergonomics of the Opal Solutions website.

Social network sharing cookies are issued and managed by the publisher of the social network concerned. Subject to the customer's consent, these cookies make it easy to share some of the content published on the Opal Solutions site, in particular via a sharing application "button" depending on the social network concerned.

Four types of social network sharing cookies are present on the Opal Solutions site:

- **Facebook**, whose cookie policy can be consulted by clicking on the following link: <https://fr-fr.facebook.com/policies/cookies/>
- **LinkedIn**, whose options dedicated to controlling or restricting the use of cookies as well as the policy on the use of cookies can be consulted via the following link: https://www.linkedin.com/legal/cookie-policy?_l=fr_FR

Most Internet browsers are configured by default so that the deposit of cookies is authorized. The browser used by the customer makes it possible to modify the standard parameters so that all cookies are systematically rejected or that only some of the cookies are accepted or refused depending on their issuer.

The fact of refusing the deposit of cookies is however likely to alter the customer's experience as well as his access to certain services or functionalities of the site.

Where applicable, Opal Solutions declines all responsibility for the consequences related to the deterioration of browsing conditions that occur due to the refusal, deletion or blocking of cookies necessary for the operation of the site. These consequences cannot constitute damage and no compensation can be demanded by this fact.

Each Internet browser offers its own cookie management settings. To find out how to modify cookie preferences, the links below provide the customer with assistance in this area.

Chrome : <https://support.google.com/chrome/answer/95647?hl=fr>

Firefox : <https://support.mozilla.org/fr/kb/enable-disable-cookies-preferences>

Internet Explorer :

<https://support.microsoft.com/fr-be/help/17442/windows-internet-explorer-delete-manage-cookies>

Safari : https://support.apple.com/kb/ph21411?locale=fr_CA