

Privacy- en cookie-policy

Latest update: Juni 2023 (v 1.1)

This privacy and cookie policy relates to the use of the Atris software (hereinafter “Atris”) and any related support. Atris consists of the Atris App and Atris Patient Monitor.

Atris is provided by your Healthcare Provider, the Data Controller to the User (you).

Your Healthcare Provider is: **abx, established at [address] in [place]**

The privacy statement, prepared by your Healthcare Provider, regarding the use of Atris is available here: **XYZ.**

This statement includes information relating to: the processing purposes, any legitimate interests, if applicable, contact details of the Data Protection Officer.

The Hosting of Atris is outsourced to and performed by Peercode on behalf of the Healthcare Provider. The policy described below explains the implementation of the outsourced processing (Hosting), in which Peercode mainly tries to describe the substantive processing, as carried out under the instructions of the Care Provider, as best as possible, but it should be taken into account that the privacy statement of the Care Provider is leading.

Peercode treats the (personal) data of Atris visitors and users with the utmost care. Peercode will therefore only use this (personal) data in accordance with the purposes described in this privacy statement and therefore instructions from the Healthcare Provider. In this privacy statement we explain which personal data we process from you via Atris, how we handle your personal data and which rights you are entitled to in that context.

Personal data

Personal data is any data that can (directly or indirectly) identify a natural person and therefore the User. Personal data can be a name or telephone number, but also, for example, a date of birth or e-mail address. Atris may process personal data, including storage. This includes all data entered or measured by the patient or healthcare provider. All data processed by Atris will be treated strictly and confidentially in accordance with your Healthcare Provider's instructions. The following personal data are processed, among others, by Peercode under instruction. If the application of Atris processes more personal data from you, your Healthcare Provider will inform you about this.

User:

- Name
- Alias
- Patient Number
- Email address
- Phone Number
- Link with care provider
- Password (hash)

Activity:

- Measurement Date
- Number of minutes of light activity, normal and vigorous activity
- Number of steps
- PAM score

Periodic Activity Data:

- Times
- PAM score
- MET Value
- Number of steps

Blood Pressure:

- Measurement date
- Systolic pressure
- Diastolic pressure
- Heart rate
- Arrhythmia

SpO2

- Measurement date
- SpO2 score
- Heart rate

Protein intake:

- Measurement date
- Food Type
- Points
- Goal

Goal:

- Minutes per day
- Number of minutes of light activity, normal and vigorous activity
- PAM score

Messages (Chat):

- Type
- Sender
- Receiver
- Title
- Message content
- Date/time

Orthopedic Goals:

- Target start and end date
- Start and end time
- Interval
- Number of MET per quarter
- Movement time

RPE-score:

- Train datum
- RPE-score

Workout:

- Date
- Heart Rate
- Average Heart Rate
- PAM Hardware information
- Workout duration

Weight measurement

- Measurement date
- Weight

Retention period

The personal data that you provide and enter when using Atris will not be kept for longer than necessary. Peercode only processes your personal data under instruction, whereby the personal data is removed under instruction or when the instructions of the Care Provider come to an end. The specific retention period is determined by your Healthcare Provider. It is possible for the User to indicate that he wishes to delete his account by means of the built-in "delete account" functionality. Then contact your Healthcare Provider to request information on the retention period of other personal data.

Cookies – Atris Patient Monitor

Atris Patient Monitor uses cookies. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to the web browser and stored by the browser on your hard drive. The identifier is then sent back to the server when the browser requests a page from the server. This allows the web server to identify and track the web browser. Cookies enable our system to recognize you on subsequent visits to the website.

Cookies can be temporary or permanent. Session cookies are only active during your visit and are deleted when you close your browser. Persistent cookies remain on your device's hard drive when you leave the website and remain there until you delete them manually or the browser deletes them after a certain period of time. Only session cookies are used by Atris. Personal data, such as a telephone number or an e-mail address, cannot be traced to a specific session cookie outside of Atris.

Most browsers automatically accept cookies, but you can change your browser to prevent cookies from being saved. For more information about cookies and how to disable them, visit www.allaboutcookies.org. If you have a smartphone, you can set the preferences via the "Settings" app of your smartphone and/or the browser(s) app(s). There are also software products available that can manage cookies for you. Please note: Disabling cookies may limit the service we can provide and impact the user experience.

Use of data and legal basis and purposes

Atris is offered to the User by the Healthcare Provider. In this case, the healthcare provider is the controller by inviting the user to the Atris App. Peercode acts as the processor and only processes this personal data on the instructions of the healthcare provider and will therefore not pass on this data to other companies or authorities unless the Healthcare Provider instructs us to do so or the law says so. The legal basis, any opt-outs/withdrawal of consents and purposes of the Healthcare Provider will be communicated to the User by the Healthcare Provider outside this privacy statement. The data can, for example, be used on behalf of the Healthcare Provider for research, quality and improvement projects. If this is the case, the Healthcare Provider will inform you about this in, for example, the privacy statement of the Healthcare Provider.

Further recipients and or categories of recipients of the personal data will be communicated by the Healthcare Provider.

In addition, the Healthcare Provider bases itself on the basis of the legitimate interest of the Healthcare Provider as controller to use specific data for quality improvement and bringing it to the attention of Atris. To achieve this, this data is shared per Peer Code. It will be explicitly indicated within Atris which information it concerns, with the aim being that the data in itself cannot be traced back to a user and therefore a natural person. The user will be alerted to this aim in the relevant input field. When this processing takes place on the basis of a legitimate interest, an opt-out option will be offered.

Data security

Peercode applies adequate security measures to ensure that the processing of your personal data, outsourced by the Healthcare Provider to Peercode, is confidential, careful and secure. Atris, deployed and offered by Healthcare Provider, also contains security measures to ensure that the processing of personal data takes place safely. Peercode measures include firewalls to protect information and procedures aimed at ensuring the confidentiality, integrity, availability and resiliency of the systems used to host, maintain and support this information.

All identifiable data of healthcare professionals and patient data is stored and encrypted by Atris. This means that the database alone cannot easily be used to identify patients or healthcare professionals. All data transported from the Atris system to healthcare professionals is encrypted with Peercode's Transport Layer Security (TLS). In addition to the service providers listed below, only the healthcare professionals of the Healthcare Provider have access to patient data, unless the Healthcare Provider has agreed otherwise with you/

Rights of the User

In accordance with the AVG/GDPR, the Controller is happy to inform the User about his/her rights through this policy:

- get an explanation about what personal data we have and what we do with it
- access to the exact personal data we have
- having errors corrected
- having obsolete personal data removed
- withdrawal of consent
- object to a particular use

Announcements

We may change this privacy policy from time to time by posting an update to this version here. To stay informed, we recommend that you visit these pages regularly.

File a complaint with the supervisory authority

In addition to the above rights, you also have the right to submit a complaint to the supervisory authority: Autoriteit Persoonsgegevens, www.autoriteitpersoonsgegevens.nl

Data Protection Officer

Peercode has appointed a so-called data protection officer. This person is responsible for privacy within our organization. Our data protection officer is called Ingmar van der Poel and can be reached by email at ingmar.van.der.poel@peercode.nl .

Contact details.

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